

## 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:	David Jones - Metacre
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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:	<input type="text"/>	Policies Map:	<input type="text"/>
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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 refer to accompanying representation prepared by Strutt & Parker and associated technical document.
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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.**

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**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)?**

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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 be able to fully elaborate on the comments we have made within our written representation and to be able to discuss with the examining Inspector(s) the proposed modifications that we feel are necessary to make the Local Plan sound.**

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Signature: Simon Handy on behalf of Metacre

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	S5.1	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Date: 26/02/2021

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Part A Reference:

Part B Reference:

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#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	CST021	Policies Map:	<input type="text"/>
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Signature: Simon Handy on behalf of Metacre

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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

Our ref: SH/212121

26<sup>th</sup> February 2021

Dear Planning Policy & Strategy Team,

### **Response to Regulation 19 consultation: Pre-submission draft of the Shropshire Local Plan**

Strutt & Parker acts on behalf of Metacre (“the site promoters”) and Beth Wilson, Jennifer Martin-Jones, Benjamin Brown and Georgina Bright (“the landowners”) in promoting land at Snatchfield Farm, Church Stretton, identified as site CST021 in the previous Regulation 18 Pre-submission draft of the Shropshire Local Plan. We write in response to the current Regulation 19 consultation and, specifically, to provide comments in relation to the Council’s approach to housing delivery in Church Stretton and removal of our site from the emerging Local Plan as a draft housing allocation.

This letter should be read in conjunction with part A and the multiple versions of part B of the consultation form that we have completed and submitted on behalf of the site promoters and landowners, as well as the following technical information that accompanies this representation:

- Church Stretton Prospective Housing Development Sites Plan (Dwg. No. 20-495-F04), prepared by Eden Building Design.

Our representation has been structured around each document that we wish to comment upon, with the following order being used:

- 1) Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038
- 2) Sustainability Appraisal and Site Assessment / Appendix F – Church Stretton Place Plan Area Site Assessments (December 2020)
- 3) S5 Church Stretton Place Plan Area Inset Map

Further sub-headings are then used to make clear (using highlighted text to ease identification) which specific policy, site or policies map our comments relate to.

## 1) **Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038**

### **Policy S5.1 Development Strategy: Church Stretton Key Centre**

We previously supported the Development Strategy set out in the Regulation 18 stage of the draft Local Plan for the Church Stretton Plan Area, which consisted of a strategy for new residential development at this key settlement to be delivered through the saved SAMDev Plan residential allocation and an identified Local Plan site allocation, otherwise known as site CST021, i.e. our clients' site. Regrettably, our clients' site – otherwise known as Snatchfield Farm – was unexpectedly removed from the draft Local Plan following the end of the Regulation 18 consultation stage. There has therefore been a fundamental change in the Council's approach to the delivery of new residential development in Church Stretton, which is one that we can no longer support for the reasons set out below.

Firstly, it is unclear to us how the Council expects to deliver their desired target of providing around 200 dwellings at this settlement without providing a clear and evidence-based strategy for doing so. Paragraph 3 of Policy S5.1 states the following:

*“New residential development will be delivered through the saved SAMDev residential allocation; 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.”*

While on a first read this may give the impression of a suitable delivery strategy, we have to respectfully submit that this strategy will not meet the area's objectively assessed needs and is not backed up by proportionate evidence to demonstrate that sufficient supply will actually emerge or be delivered from these sources. Therefore, Policy S5.1 is neither positively prepared, justified nor effective, as required by paragraph 35 of the National Planning Policy Framework (“NPPF”) 2019. In other words, the draft Shropshire Local Plan is unsound in its current form.



It is accepted that the 200-home figure within Policy S5.1 has not been set as a minimum and has been worded as “*around 200 dwellings*”. Nevertheless, given the strategic importance of this settlement to the southern part of the county, it can be reasonably assumed that this is the delivery target during the plan period and that the vast majority of this housing need should be delivered to meet the housing needs of the area. As noted at paragraph 5.89:

*“The nature and scale of future development within the Local Plan is designed to maintain and enhance the settlement’s [Church Stretton] role as a Key Centre and provide for the needs of the community and that of its wider hinterland, whilst also recognising the towns location within a nationally designated landscape and the other natural and historic environment assets present.”*

The scale of new housing development proposed by the Local Plan for Church Stretton therefore takes into account its setting within the nationally designated Shropshire Hills Area of Outstanding Natural Beauty (“AONB”) and the other environmental and heritage assets present. While the Principal Centres of Ludlow and Bishop’s Castle and the Key Centres of Cleobury Mortimer and Craven Arms will also contribute towards the growth objectives in the south of the county, each of these settlements has its own residential development target and are not, in our view, located sufficiently close to Church Stretton or its wider hinterland to accommodate the latter’s housing need to ensure that Church Stretton does not get overlooked as part of the strategic plan-making process. In short, new housing development has to occur at Church Stretton itself if its vitality, self-sufficiency and role as a Key Centre are to be maintained into the future.

With the above observations in mind, we will now move onto appraising the prospective sources of housing land supply in and around Church Stretton to understand whether the target of 200 dwellings by 2038 is achievable based on the Council’s current approach to site allocations.

Paragraph 5.92 states that Appendix 5 of the Local Plan provides information on the levels of residential completions achieved since the start of the plan period and commitments available within Church Stretton, which the Council asserts will contribute towards the delivery of the town’s residential development guidelines. Appendix 5 is set out below for ease with the relevant row for Church Stretton highlighted:

## Appendix 5: Residential Development Guidelines and Residential Supply

A5.1. Schedule A5(i) summarises the residential development guidelines for the Strategic Centre, Principal Centres and Key Centres. It also identifies the completions achieved in 2016/17, 2017/18 and 2018/19 and the various forms of commitments available to achieve the identified residential development guidelines.

A5.2. This information will be reviewed annually through the Five Year Housing Land Supply Statement and the Authority Monitoring Report.

Schedule A5(i): Residential Guidelines and Residential Supply within the Strategic Centre, Principal Centre and Key Centres							
Settlement	Type of Settlement	Residential Development Guideline	Total Residential Completions (2016/17, 2017/18 and 2018/19)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at 31st March 2019)	Saved SAMDev Plan Allocations without Planning Permission (as at 31st March 2019)	Local Plan Allocations	
Albrighton	Key Centre	500	24	171	77	180	48
Bishops Castle	Key Centre	150	8	62	40	0	40
Bridgnorth	Principal Centre	1,800	52	38	500	1,050	160
Broseley	Key Centre	250	128	72	0	0	50
Church Stretton	Key Centre	200	17	62	0	0	121
Cleobury Mortimer	Key Centre	200	30	43	7	0	120
Craven Arms	Key Centre	500	33	48	325	0	94
Ellesmere	Key Centre	800	112	348	0	170	170
Highley	Key Centre	250	72	47	0	100	31
Ludlow	Principal Centre	1,000	106	802	0	10 <sup>10</sup>	82
Market Drayton	Principal Centre	1,200	85	474	0	435	206
Much Wenlock	Key Centre	200	32	21	0	120	27
Oswestry	Principal Centre	1,900	312	116	1,127	240	105
Shifnal	Key Centre	1,500	605	573	0	230	92
Shrewsbury	Strategic Centre	8,625	1,743	3,019	798	2,560	505
Wem	Key Centre	600	129	72	100	210	89
Whitchurch	Principal Centre	1,600	260	748	60	450	82

In summary, Appendix 5 identifies 17 residential completions in the combined years 2016/17, 2017/18 and 2018/19 with a further 62 homes expected to be delivered on sites with planning permission or prior approval (as at 31<sup>st</sup> March 2019). This amounts to 79 new homes, leaving a significant windfall allowance of 121 dwellings to be found.

The Council's most recent Five Year Housing Land Supply Statement was published on 16<sup>th</sup> March 2020 and contains data up to 31<sup>st</sup> March 2019. Somewhat unhelpfully the statement seems to identify a supply of 90 dwellings from sites with planning permission or prior approval in Church Stretton, including one site that had a resolution to grant at the time (ref. 18/04672/FUL) which has since been fully consented, and therefore it was initially difficult to establish how the Council had reached its figure of 62 dwellings in the settlement from sites with planning permission or prior approval as shown in Appendix 5 above. However, once we established the planning permissions or prior approval applications that have now expired and therefore are no longer capable of being implemented, we can confirm that 62 dwellings is an accurate figure of what could feasibly be delivered in the near future. In short, we accept that the windfall allowance for Church Stretton over the period of the emerging Local Plan is 121 dwellings.

We believe a single planning application for new residential development has been approved since the last Five Year Housing Land Supply Statement was published – application 20/00956/FUL for the construction of 6 affordable dwellings following the demolition of 4 existing properties (a net increase of 2 dwellings) at 5 Lutwyche Road – meaning the most up-to-date windfall requirement for Church Stretton at the time of writing is **119 dwellings**.

The saved SAMDev residential allocation (site reference CSTR019 – 43 dwellings on Land north of Sandford Avenue) is accounted for in the Local Plan Appendix 5 figure of 62 dwellings that benefit from planning permission in Church Stretton. Therefore, the remaining requirement of 119 dwellings is expected to be met by appropriate small-scale windfall residential development within the Church Stretton development boundary shown on the Policies Map and appropriate cross-subsidy and exception development.

The Council's most recent Authority's Monitoring Report ("AMR") provides evidence that windfall development has historically been delivered in Church Stretton and, consequently, we accept that it is reasonable to include a windfall allowance in the emerging Local Plan in the context of paragraph 70 of the NPPF. However, we question whether there is compelling evidence that past windfall delivery rates will continue at the same rate into the future, particularly in the context of a landscape sensitive settlement such as Church Stretton where speculative or redevelopment opportunities become increasingly scarce as previous sites are built out. The same point applies to cross-subsidy and exception development, i.e. suitable and available sites still need to exist in order for new housing to be delivered from this source of supply.

The most recent Five Year Housing Land Supply Statement (published 16<sup>th</sup> March 2020) states that 598 dwellings are expected to be delivered across the county every five years through windfall development, based on historic delivery rates and expected future trends, or 5.6% of the Council's most recent anticipated five-year supply. Taking this delivery rate and applying it to Church Stretton's target of 200 dwellings and extending it to cover the entire plan period (21 years, or 23.52% of Church Stretton's supply from windfall sites (4.2 x each 5-year supply window)), it can be calculated that 47 dwellings may be delivered via this source.

An alternative approach to calculating the potential supply from windfall sites in Church Stretton is to consider what proportion of county-wide new housing has historically been delivered in the settlement. The most recent AMR confirms that 1.9% of the county's housing land supply was delivered in Church Stretton. 1.9% of the Council's total anticipated windfall development during the plan period – 2,512 dwellings, extrapolated to cover the full plan period of 21 years – amounts to 48 dwellings, which is almost identical to the figure we calculated above.

Therefore, we have made an assumption that a maximum of 48 new dwellings could, potentially, be delivered in Church Stretton during the period of the draft Local Plan, notwithstanding our concerns that Shropshire Council may not have presented *compelling* evidence to demonstrate that there is a realistic expectation that this level of supply will be delivered by windfall schemes in the current circumstances. Subtracting this hypothetical supply from the town's overall housing need would result in a remaining requirement during the plan period of **71 dwellings**.

Setting aside that we have given the Council the benefit of doubt and accepted that approximately 48 new homes may be delivered through windfall sites, we feel it is important to set out that we have used our professional planning judgement to try and identify any sites outside the development boundary beyond our clients' land at Snatchfield Farm that might present developable land (as defined by the NPPF) to meet Church Stretton's remaining requirement without success. In other words, we are of the firm belief that our clients' land at Snatchfield Farm is the only logical location outside the development boundary to build new housing to serve the needs of the town without an underlying constraint preventing the site from being developed.

If alternative sites did come forward elsewhere, such as within the development boundary, then these are still only likely to deliver the 48 new windfall homes in our view. Once these sites have been exhausted, we can see no evidence within the draft Local Plan or its supporting evidence base to suggest that a further 71 dwellings will be delivered from cross-subsidy and exception development. That means our clients' land, which was previously allocated for 70 dwellings, will still be essential if the Council truly wishes to meet its target of delivering 200 dwellings at the town. Put simply, we urge the Council to re-allocate the land at Snatchfield Farm for residential development before the draft Local Plan is submitted for examination.

We have prepared a site plan that accompanies this representation which shows Prospective Housing Development Sites in and around the edges of Church Stretton, along with the proposed development boundary (with a bold red line). The sites are shaded red and yellow, which replicates the colour coding that the Council has used in its most recent Strategic Land Availability Assessment (“SLAA”, 2018). Red sites are those that the Council has already rejected and yellow sites are those that the Council believed, at the time, may have long term potential. Sites that in our view are deemed developable (and have not already been accounted for in the Council’s Housing Land Supply Statement) are then marked with blue hatching – this includes ‘yellow’ SLAA sites within the development boundary that have long term potential which we have assumed will be brought forward as part of the windfall contribution. It also includes our clients’ site which unsurprisingly we contend is developable and the saved SAMDev allocation, ref. CSTR019, for ease of reference (the latter is however already accounted for in the Council’s supply). Only with our clients’ land does the 200-dwelling target become achievable. The table below explains why we have discounted the remaining yellow sites beyond the development boundary as prospective residential development sites:

SLAA site reference	Site location	Reason(s) for site being discounted
CST004	South West of the Church Way Business Centre	There is uncertainty as to whether the site has a road frontage, meaning access to the site is in doubt.
CST007	Hazler Hill Farm, Hazler Road	Adverse topography of the site may restrict development upon it. Vehicular access is unlikely to be possible. Hazler Road is very narrow at this point and should not be subject to additional traffic according to Council. Necessary improvement could not be delivered by this development as significant third party land would be required.
CST011	Land off Burway Road	Located entirely within a Conservation Area and within 300m of several listed buildings. Therefore, it is considered that unacceptable heritage impact would be caused by this site being developed. Site’s availability for residential development is also unknown, as confirmed by the Council’s Sustainability Appraisal (“SA”).
CST014	Land off Cunnery Road	Confirmation of the ability to provide safe access to and into the site is uncertain.
CST020	Land NW of Gaerstone Farm	Site contains Ancient Woodland (also designated as a Local Wildlife Site) and Veteran Trees, which present significant constraint to site’s development.

CST020VAR	Land NW of Gaerstone Farm (variation)	Site is very prominent in the landscape and is likely to require significant sustainable long-term landscape mitigation, which may not be feasible. Proximity of farm may be prohibitive.
CST028	Land at New House Farm	Ability to provide an appropriate vehicular, pedestrian and cyclist access to and into the site is uncertain and has not been adequately satisfied to date. The site lies in the most visually sensitive part of an area with a high visual sensitivity to development. Previous outline planning application (ref .14/04374/OUT) for the erection of 85 dwellings and 16 holiday units was withdrawn in October 2015 and no subsequent applications have followed.
CST029	Land between Clive Avenue and Kenyon Road	The site slopes steeply and there are concerns over access via Clive Avenue.
CST031	South of Clive Avenue	The site slopes steeply and there are concerns over access via Clive Avenue.
CST033	Watling Street North (eastern field)	Ability to provide an appropriate vehicular, pedestrian and cyclist access to and into the site is unlikely to be achievable. Cwm's Lane would not be acceptable or suitable (too narrow and no footways). Highways England are unlikely to support any access off the A49. There may also be adverse effects on the setting of Caer Caradoc Scheduled Monument.
CST034	Watling Street North (southern field)	Proposed vehicular access is through CST033, so same issues as those raised above.
CST036	225 Watling Street South	There are concerns about vehicular access via Clive Avenue and there is an inability to accommodate development without significant adverse effects on trees.

Based on the above table, we believe there is a distinct lack of evidence and justification to conclude that these sites have a good prospect of being brought forward as residential development sites and certainly not before our clients' land could be developed.

A number of representations have previously been made by other interested parties, including Church Stretton Town Council and the local opposition group, Save Snatchfield, that an alternative site behind Church Stretton School would be a suitable alternative site for up to a maximum of 110 dwellings. We understand that this site is identified as CST019VAR. Shropshire Council has dismissed this land both

as a potential windfall site and as an allocation for multiple reasons, including that a significant proportion of the site is located in flood zones 2 and/or 3; that insufficient width exists within the boundary of the site to provide the required access improvements to accommodate the proposed scale of development; and that an alternative access to the site is subject to a ransom strip.

Another site abutting Springbank Farm, ref. CST035, has also been put forward by the aforementioned interested parties as potentially suitable for 20 dwellings. Again, Shropshire Council has dismissed this site as it is known to have Great Crested Newts either within or in close proximity to it with insufficient land for the necessary mitigation.

Finally, it is noteworthy that the other residential allocation that forms part of the SAMDev Plan, ref. CSTR018, on the playing fields to the north side of the Church Stretton School for up to 50 dwellings has not been carried forward into the emerging Local Plan, as is the case with site CSTR019. This demonstrates in our view the lack of evidence or hope of this site coming forward in the future. A full planning application for 47 dwellings on this site, ref. 15/01276/FUL, was withdrawn in January 2020 and the Council's decision to effectively abandon this site is a clear indication that the issues surrounding this site are unresolvable.

We respectfully submit that the Town Council and local opposition group are wrong to suggest that sites CST019VAR, CST035, or the school playing fields are reasonable and, perhaps more importantly, developable and deliverable alternatives when such an assertion ignores the constraints and problems affecting these parcels of land.

To reiterate, we believe there is a distinct lack of evidence and justification to conclude that alternative sites exist in Church Stretton to achieve the development target of 200 new dwellings and that even with an allowance of 48 dwellings coming forward on windfall sites, we believe there is a clear need to allocate our clients' land at Snatchfield Farm to address the shortfall of circa 70 dwellings that will exist if the current draft Local Plan is progressed without modification.

We believe the Pre-Submission Draft of the Shropshire Local Plan and specifically Policy S5.1 are unsound for the following reasons:

- **Not positively prepared:** Policy S5.1 fails to provide a decisive strategy which, as a minimum, seeks to meet Church Stretton's objectively assessed needs. The proposed sources of housing supply for the town – a single saved SAMDev Plan allocation, an allowance for windfall sites, and support for cross-subsidy or exception sites – does not provide a clear spatial strategy and, as a result, Policy S5.1 does not fulfil its purpose and will be ineffective.
- **Unjustified:** The proposed strategy set out in Policy S5.1 for new residential development is inappropriate because there is a distinct lack of evidence to support the notion that around 200 dwellings will be delivered through the proposed sources of housing supply. In other words, there is a lack of proportionate evidence to demonstrate that suitable sites (other than our clients') exist and, therefore, we firmly believe that one or more additional residential allocations need to be made.
- **Ineffective:** As set out above, the failure for the draft Local Plan to identify appropriate and much needed residential allocations for Church Stretton and its wider hinterland means the development plan will be ineffective over its full plan period. The Council's decision to make a U-turn for a second time and omit our clients' land at Snatchfield Farm as a proposed allocation shows a lack of decisive plan-making, contrary to the Government's objective of significantly boosting the supply of homes and to identify a sufficient amount and variety of land where it is needed, as set out in the NPPF.

**Suggested modification to Policy S5.1** – Re-introduce the allocation of land at Snatchfield Farm (CST021) for up to 70 dwellings.

## **2) Sustainability Appraisal and Site Assessment / Appendix F – Church Stretton Place Plan Area Site Assessments (December 2020)**

### ***Appendix F – Church Stretton Place Plan Area Site Assessments: Stage 3 Site Assessment of CST021***

Two of the key aims of the Sustainability Appraisal that accompanies the draft Local Plan is to consider how the Plan contributes to improvements in environmental, social and economic conditions and to



assess all reasonable alternatives. The Stage 3 site assessment of our clients' land – identified as site reference CST021 in Appendix F – highlights some technical considerations that would need to be addressed should a planning application be brought forward, such as ecology/botanical, heritage and tree matters, but raises no site-specific or unassailable issues with regard to its deliverability. The reasons for excluding it as a housing allocation are vague and consist of the Council's recent stance that the residential guideline for Church Stretton can be achieved through a combination of windfall sites within the town's development boundary and through the delivery of exception and cross-subsidy affordable housing sites.

We believe it is noteworthy that all other sites that are discounted in Appendix F are considered to have site-specific constraints or issues that prevent them from being allocated in the Local Plan, as set out in the 'Reasoning' box for each site. Put another way, the Council has not been able to identify such issues with our clients' land but nevertheless reaches the conclusion that it should not be allocated. It is submitted that this is a flawed assessment and that insufficient reasoning has been given to reject the land at Snatchfield Farm.

While we do not believe that modifications necessarily need to be made to the Sustainability Appraisal as the overall conclusions regarding our site are not inherently negative, we believe it is important for the Council to consider our representation in advance of the Local Plan being submitted for examination or, ultimately, for the examining Inspector to understand our position.

Finally, we consider that an identified need exists to allocate major residential development within the Shropshire Hills Area of Outstanding Natural Beauty and that bringing forward such development on land at Snatchfield Farm will be in the interest of existing and future residents, particularly in providing a meaningful contribution towards the local area's market and affordable housing needs and helping to sustain the vitality of Church Stretton and its role as an important Key Centre. The scope for developing outside of this designated area is limited in our opinion due to the town's location at the heart of the AONB remote from other settlements of any reasonable size, i.e. other settlements are too distant to directly meet the needs of Church Stretton and its hinterland.

### 3) **S5 Church Stretton Place Plan Area Inset Map**

#### **S5 Church Stretton Place Plan Area Inset Map**

Based on the comments made throughout this representation, we submit that our clients' land at Snatchfield Farm (site CST021) should be reintroduced into the Local Plan as a housing allocation.

**Suggested modification to Inset Map S5: Church Stretton** – Re-introduce the allocation of land at Snatchfield Farm (CST021) for up to 70 dwellings.

While the Regulation 19 stage of the plan-making process is not intended to provide respondents with an opportunity to provide further promotional material with regard to prospective development sites, we nevertheless feel it is important to emphasise that our clients' land is deliverable and that there are no reasons why it cannot come forward. We can confirm that the site is viable and we anticipate that the dwellings could be delivered in the short to medium term, so between 2022 and 2029.

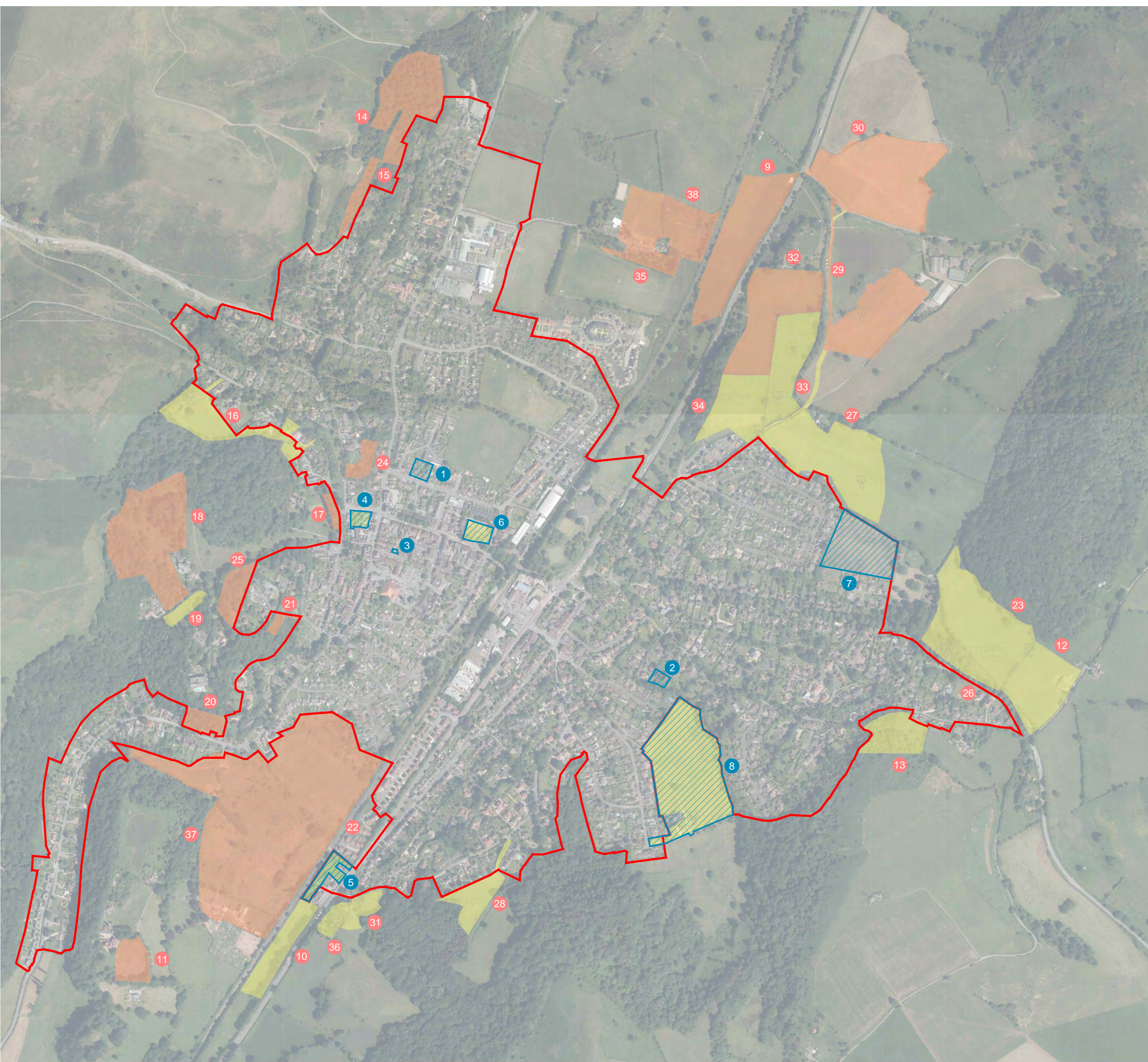
The site is available now, offers a suitable location for development, with the delivery of housing on the site within the next five years a realistic prospect. The construction of around 70 new homes at Snatchfield Farm will deliver economic and social benefits for the town with viable options available to mitigate any limited environmental harm. Further details about our clients' site can be found within our representation made in relation to the previous Regulation 18 Local Plan consultation.

Thank you for taking our comments into consideration. We wish to participate in the relevant future Local Plan examination hearing sessions once they have been organised.

Please get in touch using the details at the top of this letter if you have any queries.

Yours faithfully,

**Simon Handy BA (Hons) MPlan MRTPI**  
**Senior Associate Director – Development & Planning**  
**Strutt & Parker**



Sites included					
Map ref.	SLAA/SA Site ref.	Planning ref.	Location	Site area (hectares)	Indicative residential capacity at 30dph/approved or proposed development quantum
1		20/00956/FUL	Lutwyche Road	0.16	2 net
2		20/02537/OUT	Hazler Road	0.11	2
3		20/03364/FUL	Queens Court	0.01	1
4	CST001 and CST002	19/03202/FUL	Burway Road	0.17	14
5	CST008		Crossways (A49)	0.37	11 (indicative)
6	CST017		Sandford Avenue	0.26	8 (indicative)
7	CSTR019 (SAMDev allocation)	16/02491/REM	Sandford Avenue	1.72	43
8	CST021		Snatchfield Farm, Chelmick Drive	4.16	70
					<b>151 subtotal</b>

Completions (2016/17, 2017/18 and 2018/19)	17 dwellings
Sites with planning permission or prior approval as at 31 March 2019	19 dwellings (minus site CSTR019 above)
Remaining windfall sites to be found	13 dwellings
Number of dwellings including sites 1-8	<b>200 total</b>

Sites not included				
Map ref.	SLAA/SA Site ref.	Location	Site area (hectares)	Indicative residential capacity at 30dph
9	CST003	North of nature reserve A49	3.26	98
10	CST004	South west of the Church Way Business Centre	1.14	34
11	CST005	Brockhurst	0.74	22
12	CST006	Gaerstone Farm, Sandford Avenue	2.10	63
13	CST007	Hazler Hill Farm, Hazler Road	1.14	34
14	CST009	Trevor Hill	0.23	7
15	CST010	Rabbit Burrow, Trevor Hill	2.66	80
16	CST011	Burway Road	1.83	55
17	CST012	Rectory Field, Burway Road	0.17	N/A
18	CST013	Tiger Hall	3.85	115
19	CST014	Cunnery Road	0.46	14
20	CST015	Ludlow Road	0.44	13
21	CST016	Ringing Stones, Cunnery Road	0.14	N/A
22	CST018	Railway at World's End	13.83	415
23	CST020	North west of Gaerstone Farm	4.02	121
24	CST023	Bank House Land, Longhills Road	0.37	11
25	CST026	Trefnant	0.70	21
26	CST027	Sandford Avenue	0.37	11
27	CST028	New House Farm	4.31	129
28	CST029	Clive Avenue and Kenyon Road	0.95	28
29	CST030	New House Farm	7.42	223
30	CST030A	New House Farm	3.51	105
31	CST031	South of Clive Avenue	0.45	14
32	CST032	Watling Street North (northern field)	2.97	89
33	CST033	Watling Street North (eastern field)	1.90	57
34	CST034	Watling Street North (southern field)	1.75	53
35	CST035	Springbank Farm	1.83	55
36	CST036	225 Watling Street South	0.35	11
37	CST037	Cemetery Road	0.91	27
38	CST038	Springbank Farm	1.28	38

— Church Stretton development boundary  
 Development site



<p>project Proposed Residential Development at Snatchfield Farm, Chelmick Drive, Church Stretton for Northern Trust Housing Development Sites</p>	<p>status Feasibility</p> <p>scale 1:500 at A1</p> <p>drawing no. 20-495-F04</p>	<p>date 14/01/21</p> <p>drawn by CJB</p> <p>checked by APS</p>	<p>Eden Building Design Beech Farm Lynn Road Thehwall Cheshire W44 2TG Tel: 01925 640550 Email: info@edenbuildingdesign.co.uk Web: www.edenbuildingdesign.co.uk</p>
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/ Initial issue  
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