

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

19th February 2021

Dear Sir / Madam,

Regulation 19: Pre-Submission

Draft of the Shropshire Local Plan 2016 to 2038

Thank you for the opportunity to comment on the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan. It should be noted that the comments below are officer comments.

As background, the South Worcestershire Development Plan (SWDP), covering the administrative areas of Malvern Hills District Council, Worcester City Council and Wychavon District Council, was adopted in February 2016. The SWC are currently reviewing the SWDP and undertook consultation on the SWDP Review (SWDPR) Preferred Options in late 2019 with the Regulation 19 consultation programmed for October 2021.

It should be noted that Malvern Hills District Council and Shropshire Council designated the parishes of Tenbury and Burford as a single Neighbourhood Area for the purposes of preparing a Neighbourhood Development Plan (NDP) by Tenbury Town Council and Burford Parish Council in March 2016. A copy of the Decision Notice is attached for information.

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The South Worcestershire Councils (SWC) note that the Shropshire Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land. We note that the Plan favours an 'urban focussed' approach, in recognition that Shropshire's largest settlements provide infrastructure and services to support housing and employment growth.

In following the urban focussed approach, we note that the majority of Shropshire's growth is proposed in the network of Market Towns. We note that for the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. We also note that where local communities are currently preparing NDP's this has generally been reflected within the proposed strategies.

Whilst the focus of the plan is on urban areas, we note that development is also proposed in Shropshire's rural areas, with a recognition that growth opportunities in these areas should be aligned to the ability of villages to provide a suitable services and facilities.

In the hierarchy of settlements, it is noted that the town of Ludlow (4.5 miles from the Malvern Hills District administrative boundary) is identified as Principal Centre, Cleobury Mortimer (0.8 miles from the Malvern Hills District boundary) is identified as a key centre and Burford (adjacent to Malvern Hills District boundary) is identified as a Community Hub settlement. It is noted that 190 dwellings are proposed at Burford over the plan period, around 200 dwellings and around 2 hectares of employment land are proposed at Cleobury Mortimer and around 1,000 dwellings and around 11 hectares of employment land is proposed for delivery at Ludlow.

In relation to Burford, it is noted that the Shropshire Local Plan is providing an indicative housing requirement of 190 dwellings at Burford, with proposed allocations on land adjoining Boraston Drive on A456 (site reference Bur004 for 100 dwellings) and land adjoining Lineage Farm on A456 (site reference Bur002 for 40 dwellings). It is noted that neither sites Bur002 or Bur004 score well in the Sustainability Appraisal – page 41 of the Sustainability Appraisal published at <https://shropshire.gov.uk/media/11331/sustainability-appraisal-report-appendices-preferred-sites.pdf> . Site Bur 002 in particular, rates poorly with a score of -12.

In light of the above background information, the SWC's comments on the Shropshire Local Plan are as follows:

- The SWDPR does not require any of South Worcestershire's housing, or other development needs, to be met within Shropshire. It should be noted that the emerging

SWDPR is proposing 4 site allocations in Tenbury Wells (3 re-allocations and one new allocation) for a combined total of 180 dwellings:

SWDP Policy Number	Site	Indicative Housing Figure
SWDP New 93	Land east and west of Terrills Lane and south of Tenbury Wells Business Park, Tenbury Wells	61
SWDP Reallocate 52	Land at Haven, Oldwood Road, Tenbury Wells	40
SWDP Reallocate 53	Land at Haven, Mistletoe Row, Tenbury Wells	44
SWDP Reallocate 54	Land south of Oaklands, Tenbury Wells	35

- The SWC's note that the Shropshire Local Plan is not seeking the SWC to meet any of Shropshire's housing or other development needs within the SWDPR area.
- Paragraph 5.141 on page 222 says "*Although the role and function of Burford, in combination with Tenbury Wells is significant, the town has yet to deliver a scale of development commensurate with its status.*" We consider this to be an unsubstantiated statement. As noted above, the SWDP and SWDPR are proposing around 180 dwellings at Tenbury Wells. Further, development at Tenbury Wells is limited due to flood risk and access issues, including no connection to the rail network.
- The SWC's have concerns about the proposed allocation of site Bur002 (land adjoining Lineage Farm on A456). As noted above, the site scores poorly in the Sustainability Appraisal. Further, liaison with Tenbury Town Council has also highlighted concerns about the loss of a flood plain and potential flooding problems if site Bur002 was to be developed.
- Liaison with Tenbury Town Council has also highlighted that an additional 190 dwellings at Burford (which probably equates to around an additional 440 residents) would place additional demands on existing services, such as doctors, at Tenbury which are presently stretched. The impact on local services at Tenbury needs to be taken into account in any housing allocations at Burford.

- Whilst Tenbury Town and Burford Parish Council's have not yet undertaken Regulation 14 consultation on their emerging Tenbury and Burford NDP, it is understood that a NDP is still being prepared. It is considered that the Shropshire Local Plan needs to recognise that Tenbury and Burford is a designated Neighbourhood Area and reflect the current position with regards to the emerging NDP.
- Paragraph 65 of the Framework says that strategic planning authorities should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The SWC have prepared an emerging housing requirement for Tenbury Wells. It is considered that it would be helpful for Shropshire Council and the South Worcestershire Councils to liaise to jointly agree a housing requirement for the Tenbury and Burford Neighbourhood Area.
- The SWC support the general approach in the Shropshire Local Plan of focusing development in the larger urban areas where there is typically better access, especially for those who don't have access to a car, to existing infrastructure and services. It is recognised that there needs to be some development in rural areas and the SWC support the principle that development in these areas is distributed according to the hierarchy of settlements, subject to an assessment of the ability of those settlements to provide services and facilities.
- The SWC consider that good access to rail stations should also be a factor in the identification of strategic housing allocations. With regard to the proposed development requirements in close proximity to the Malvern Hills District administrative boundary, it is noted that Ludlow has a railway station, but it is considered that Burford and Cleobury Mortimer are not well served by rail and we would like to see the transport evidence which shows that there is no material impact on road junctions in Malvern Hills District.

We hope that the above comments are helpful. Please do not hesitate to contact me if you would like to discuss them in more detail.

If you require clarification on any issues related to the Tenbury and Burford Neighbourhood Plan please contact David Clarke

We look forward to continuing constructive dialogue as our respective Local Plans progress, including discussions relating to any Duty to Cooperate Statements of Common Ground.

Yours faithfully

Holly Jones

On behalf of the South Worcestershire Councils

Malvern Hills, Worcester City and Wychavon District Councils