

#40

**COMPLETE****Collector:** New Link (Web Link)**Started:** Wednesday, April 23, 2014 6:17:05 PM**Last Modified:** Wednesday, April 23, 2014 6:29:33 PM**Time Spent:** 00:12:28**IP Address:** 86.184.155.255

## PAGE 1

**Q1: Your details:**

Name: Mr Keith Webster  
 Organisation (if applicable): Ancer Spa Ltd  
 Address:

**Q2: Are you acting on behalf of anyone?** Yes

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**Q3: Who are you acting on behalf of:**

Name: Mr Darroll Harrison  
 Organisation (if applicable): Local Resident  
 Address:  
 Email: C/O Agent  
 Telephone: C/O Agent

## PAGE 3: Representation details

**Q4: Please give the policy/paragraph/policies map details for your first representation relates to:**

Paragraph 3 of Policy S5.1 (on page 110 of the Plan) which states: 'Further to Policy MD3, the release of further greenfield land for housing will be focused to the east of the A49 on sustainable sites adjoining the development boundary'.

**Q5: Is your representation in support or objection?** Object

**Q6: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.**

Legally compliant No  
 Sound No

**Q7: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)**

Not justified, Not effective,  
 Not consistent with the National Planning Policy Framework

**Q8: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.**

Justified

The SAMDev Plan is not 'justified' as, in relation to Church Stretton, paragraph 3 of Policy S5.1 does not represent the 'most appropriate' strategy, when considered against the reasonable alternatives, and is not based on 'proportionate evidence'. In particular, evidence from the local community, including the Town Council, has not been considered in regard to this part of the Policy.

It is also not 'justified', as paragraph 3 of Policy S5.1 is not 'evidence-based'. Indeed the 'evidence' within the SAMDev Sustainability Assessment (page 60) suggests that part of the land referred to within paragraph 3 of Policy S5.1 (which includes Site CSTR27/09) is not suitable as the 'Highways Agency had concerns over A49 access and couldn't agree to the development'. The Sustainability Appraisal also notes that for this reason, it 'wasn't carried forward as a preferred site'.

### Inconsistency with National Policy

Linked in with this is an inconsistency with National Policy. As paragraph 3 of Policy S5.1 is not based upon up-to-date 'evidence', it is inconsistent with the NPPF. Paragraph 158 of the NPPF states that 'each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area'.

Paragraph 159 of the NPPF states that local authorities should 'prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. However the last update of the Strategic Housing Land Availability Assessment (SHLAA) was undertaken in 2009/10, following an initial assessment in 2008. The evidence base is therefore 4-5 years out-of-date. Although a review of the SHLAA (2014) is now being carried out by the local authority, with a current public consultation on the document ending on 7 May 2014, this will not be in time to 'feed into' the SAMDev Plan process. In order to be consistent with national policy, the Shropshire SHLAA update should have been completed prior to the SAMDev Plan, so that the Assessment could 'inform' the SAMDev Plan process.

In our opinion, the 'greenfield land to the east of the A49' is not 'sustainable'. This is, in part, confirmed by the SAMDev Sustainability Appraisal, which notes in relation to Site CSTR27/09 (which forms part of this area), 'the assessment is negative for access to bus transport and the primary school. The eastern third of the site is within 250m of a Wildlife Site'. As noted above, the Highway Agency also had concerns in relation to accessing the site, and as such could not 'agree to the development'. The land is greenfield, is located in the AONB and is more remote in terms of pedestrian access from facilities in the Town than are other available sites.

Our view is that, as the land in question is not sustainable, the SAMDev Plan will not enable the delivery of 'sustainable' development, and so is also not consistent with policies in the National Planning Policy Framework (NPPF), in this regard.

### Effective

Policy S5.1 paragraph 3 is not 'effective', as other more suitable and sustainable options are available. The land referred to within this paragraph is not required in order to meet the housing needs identified for the plan period. This is demonstrated by the Church Stretton housing numbers and sites allocated to meet this need within the SAMDev Plan.

Should additional sites be required towards the end of the plan period or beyond, further sites have been proposed by the local community. In any event, 'future directions of growth' for Church Stretton and sites to meet future requirements should be identified and analysed at the appropriate time through the SHLAA and Sustainability Assessment process. As an update of the SHLAA Assessment has only just been prepared for public consultation, following a 4-5 year gap, this process is not yet at a sufficient stage to provide sound evidence to inform the SAMDev Plan process.

Policy S5.1 paragraph 3 only refers to release of greenfield land east of the A49 for housing, but it is understood that emerging development proposals for this area of land also include significant employment and leisure development with associated infrastructure. The cumulative impact of these proposals together with any housing development, particularly on the AONB and specifically on its prime assets of Caer Caradoc and Helmeth Hill should be the subject of full assessment and would probably be 'EIA' development. There would be a general urbanisation of this part of the AONB which would fundamentally alter its intrinsic rural character. This should be a principal consideration in any Sustainability Appraisal and consequently reference in Policy S5.1 paragraph 3 to release of this greenfield land is premature in advance of its full assessment and comparison with other alternative strategies or directions for growth in Church Stretton.

### Conclusions

By including paragraph 3 of Policy 5.1 within the SAMDev Plan, the Plan as a whole is not sound as it is not 'consistent with National Policy', 'justified' or 'effective'.

Any strategic consideration of long-term potential 'directions of growth' and site allocations should take into account the Shropshire SHLAA update and Core Strategy review and be based upon a full assessment of supply and demand in Church Stretton, including progress during the Plan period of the delivery of sites allocated within the SAMDev Plan.

A further concern is that by referring to 'long-term potential' within the Plan now, this will encourage landowners / developers to submit speculative applications during the Plan period. This would be contrary to the principles of the Localism Act 2011 including the duty to co-operate by working with other public bodies such as Church Stretton Town Council on locally determined development strategies. The SAMDev Plan was amended to better reflect the views of the Town Council which included rejection of the 'land east of the A49' option in favour of more sustainable alternatives. Re-introducing this option flies in the face of this previous co-operation.

## SAMdev consultation 2014

**Q9: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.**

The text within paragraph 3 of Policy S5.1 (on page 110 of the Plan) which states: 'Further to Policy MD3, the release of further greenfield land for housing will be focused to the east of the A49 on sustainable sites adjoining the development boundary', should be deleted from the document.

Policies within the Plan should be evidence-based and restricted to fulfilling requirements within the plan period.

**Q10: Do you wish to make another representation?**

No

### PAGE 4: Representation details 2

**Q11: Please give the policy/paragraph/policies map details for your first representation relates to:**

*Respondent skipped this question*

**Q12: Is your representation in support or objection?**

*Respondent skipped this question*

**Q13: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.**

*Respondent skipped this question*

**Q14: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)**

*Respondent skipped this question*

**Q15: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.**

*Respondent skipped this question*

**Q16: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.**

*Respondent skipped this question*

**Q17: Do you wish to make another representation?**

*Respondent skipped this question*

### PAGE 5: Representation details 3

**Q18: Please give the policy/paragraph/policies map details for your first representation relates to:**

*Respondent skipped this question*

**Q19: Is your representation in support or objection?**

*Respondent skipped this question*

**Q20: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.**

*Respondent skipped this question*

**Q21: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)**

*Respondent skipped this question*

**Q22: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.**

*Respondent skipped this question*

**Q23: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.**

*Respondent skipped this question*

PAGE 6: Finally...

**Q24: Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination

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**Q25: If you wish to attend the examination please explain why you think this is necessary.**

We have local knowledge of the planning situation and issues in Church Stretton, which would be of value to the inspector.

**Q26: Do you wish to be notified of any of the following: (we will contact you using the details you have provided)**

When the SAMDev plan has been submitted for examination	Yes
When the Inspector's report is published	Yes
When the SAMDev plan is adopted	Yes