

Appendix B.5. Shropshire Council - Local Plan Review - Preferred Sites Consultation

Church Stretton
Shropshire Council

31 May 2019

Notice

This document and its contents have been prepared and are intended solely as information for Shropshire Council and use in relation to analysing and summarising the consultation responses from the recent Preferred Sites Consultation and to provide a number of key deliverables to support the Council in moving forward the review of the Local Plan. analysing and summarising the consultation responses from the recent Preferred Sites Consultation and to provide a number of key deliverables to support the Council in moving forward the review of the Local Plan.

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This document has 14 pages including the cover.

Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
Rev 1.0	Draft Church Stretton	NC	MG	VD	VD	24/05/2019
Rev 2.0	Final Church Stretton	NC	MG	VD	VD	31/05/2019

Client signoff

Client	Shropshire Council	
Project	Appendix B.5. Consultation	Shropshire Council - Local Plan Review - Preferred Sites
Job number	5188227	
Client signature / date		

Contents

Chapter	Page
Introduction	4
1. Overview	5
2. Delivering Local Housing Needs	5
2.1. Question 3	5
2.2. Question 4	6
3. Windfall Development	6
3.1. Question 5	6
3.2. Question 6	6
4. Church Stretton Place Plan Area	7
4.1. Question 17 (a)	7
4.2. Question 17 (b)	7
4.3. Question 17 (c)	8
4.4. Question 17 (d)	8
5. Further Information	9
5.1. Question 63	9
5.2. Question 64	9
Appendices	11
Appendix A. Quantitative Analysis.	12
A.1. Question 3	12
A.2. Question 4	12
A.3. Question 5	12
A.4. Question 6	12
A.5. Question 17 (a)	13
A.6. Question 17 (b)	13
A.7. Question 17 (c)	13
A.8. Question 17 (d)	13
A.9. Question 63	13

Tables

No table of figures entries found.

Figures

No table of figures entries found.

Introduction

Following approval from Cabinet on the Shropshire Council Preferred Sites Consultation, consultation documents for this third stage of the Local Plan Review were published on 29th November 2018 and the consultation ran till the 9th February 2019.

This stage of consultation sought views from all parties on the Preferred Sites Consultation in Shropshire for the period 2016-36.

Specifically, the consultation sought views of all parties with an interest in the preferred development strategy and sites in these identified locations, so that relevant views and evidence can be taken into account in deciding the best way forward. The Consultation Document:

- Outlines a housing policy direction to improve the delivery of local housing needs;
- Establishes development guidelines and development boundaries for Shrewsbury, Principal and Key Centres and each proposed Community Hub; and
- Sets out the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period to 2036.

These responses will be used to inform further development of the Local Plan Review. This document summarises the key issues raised by respondents to the consultation in the Church Stretton Place Plan Area.

1. Overview

This report provides a summary of the consultation comments received in response to the Church Stretton Place Plan area-specific questions posed as part of the Shropshire Council Local Plan Review Preferred Sites Consultation.

The following sections set out the analysis of the qualitative comments from the consultation. Questions 3 and 4 sought views on the delivery of local housing need, questions 5 and 6 sought views on windfall development. The key issues and concerns raised in response to these questions by consultees that responded to the Church Stretton-specific questions are summarised in Sections 2 and 3.

There were four questions specifically relating to the Church Stretton Place Plan Area. The responses to these questions are summarised in Section 4.

Question 63 asked respondents whether any Community Clusters should be added in Church Stretton and Question 64 asked for any other comments. The responses to both questions by consultees that responded to the Church Stretton-specific questions have been summarised in Section 5.

A total of 341 consultees responded to these questions.

The quantitative assessment of the comments is set out in Appendix A.

2. Delivering Local Housing Needs

2.1. Question 3

Question 3 sought views on whether respondents thought that Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing. Amongst respondents to this question, who were interested in the Church Stretton Place Plan Area, there were similar levels of those who agreed, disagreed and did not know / had no opinion.

Respondents who 'did not agree' made the following comments:

- Several respondents thought that this policy was inappropriate for Church Stretton, stating that Church Stretton is a unique Key Centre within an Area of Outstanding Natural Beauty (AONB) and should not be considered in the context of rural housing as referred to in Paragraph 77 of the National Planning Policy Framework (NPPF) (2019).
- Other respondents requested greater clarity on the protection of the AONB before they could support the policy.
- Whilst, another respondent asked for more precision regarding the exact ratios of Open Market to Affordable housing.
- Respondents expressed concern that this policy may facilitate 'back door consents' to small developers, landowners and housing companies.
- One respondent objected to the policy due to beliefs that housing should be delivered through public expenditure rather than a cost imposed on the developer.

The respondents who supported the policy made the following comments:

- The nature of the site and needs of the community should be considered.
- Certain sites require appropriate landscaping before they are suitable for higher density development.
- Cross Subsidy is only acceptable if it delivers a significant number of affordable homes. The policy should not be used as a 'fig leaf' to conceal previous undersupply of affordable housing.
- One response in support questioned whether this policy was suitable in an AONB.

The respondents who checked don't know / no opinion commented that affordable housing should not be a separate product to market housing. Several other respondents commented that they did not understand this question.

2.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) a development mix assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review.

The majority of respondents to this question, who were interested in the Church Stretton Place Plan Area, stated that the development mix should be assessed on a site by site basis.

The site by site approach was preferred because it offered flexibility over a rigid framework and it acknowledges situations where certain sites have extraordinary developmental costs. Although respondents supported a site by site approach, they also stated that there should be a minimum affordable housing requirement for all sites.

One comment received from a respondent who preferred a set development mix claiming that the policy would result in a mix of housing that is better for the community.

One respondent who only provided a comment, wrote that Shropshire Council's approach to "mixed" development in the Church Stretton Place Plan Area is "unsound." The respondent asks the Council to undertake a full objective assessment of Church Stretton's detailed housing need and then establish mechanisms to buy, build or convert dwellings to provide those needed.

3. Windfall Development

3.1. Question 5

Question 5 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines. Most respondents to this question, who were interested in the Church Stretton Place Plan Area, supported a windfall allowance and made the following comments:

- Several respondents believed the allowance for Church Stretton was too low given the number of sites identified but not assessed at Stage 3. In addition, they stated that the housing density assumptions were too low for brownfield sites in the town centre. One respondent suggested that historic windfall rates had been underestimated.
- Other respondents supported the windfall allowance because it would avoid developing greenfield sites which were considered important in the AONB.
- One respondent commented that dwellings in All Stretton and Little Stretton should be counted towards the Church Stretton guideline as all the amenities are in Church Stretton.

The respondents who did not support the windfall allowance made the following comments:

- Windfall housing should be counted in addition to the housing guideline and not used to artificially inflate the 5 Year Housing Supply.
- One respondent opposed windfall development because it destroyed green spaces.

The respondents who checked 'don't know/ no opinion' made the following comments:

- Although the supply of suitable sites is limited, windfall development can reduce the need to enlarge the development boundary.
- Objection to the use of official terminologies and windfall allowances need to be justified with a clear geographical area marked in the final plan.

3.2. Question 6

Question 6 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines. The majority of respondents to this question, who were interested in the Church Stretton Place Plan Area, supported an employment windfall allowance and made the following comments.

- There is demand for employment land in Church Stretton and it would complement planned housing.
- One respondent suggested the area for employment land should be widened and the area-wide policy in the Strategic Allocations and Managing Development Plan (SAMDev Plan) should be carried forward.

- Development would not have an adverse impact on community structure and amenity.

The respondents who did not support the employment windfall allowance made the following comments:

- Development on these sites will destroy beauty and landscape of the area as they are within the AONB.
- There is no evidence of proven demand for employment land in Church Stretton, and the appearance of employment land areas would be detrimental to the main economic and employment activity of the town as a tourist centre.

One respondent who did not check a response commented that there is no employment land delivered from the SAMDev Plan allocation.

4. Church Stretton Place Plan Area

4.1. Question 17 (a)

Question 17 (a) sought views on whether respondents agreed with the preferred housing and employment guidelines for Church Stretton. The majority of respondents did not agree with the proposed housing and employment guidelines and made the following comments:

- The quantum of housing in the proposed guideline is too high and fails to recognise Church Stretton's uniqueness as the only market town in the Shropshire Hills AONB.
- Existing employment land is adequate based on scaled back housing guideline. Existing imbalances should be included in calculations for housing and employment guidelines.
- The proposed housing will place too much pressure on existing infrastructure.
- Using guidelines limits the size of development, removing the guideline would result in more natural and organic development.
- Several respondents suggested that the type and tenure of housing was more important than the quantum of housing in the guideline. Respondents highlighted adequate turnover of market property and suggested that affordable homes and town centre housing are more important for attracting and housing the working age population. There was also more general criticism of the housing guideline for not responding to local needs although no further details were provided on this point.

The respondents who supported the proposed housing guidelines made general comments supporting Church Stretton's identification as a Key Centre and the need to provide further housing and employment growth as well as, promoting their client's site to help achieve the guidelines.

One comment was received from respondents who checked 'don't know/ no opinion' claiming that Shropshire Council had not provided evidence to justify the proposed housing guideline in Church Stretton.

4.2. Question 17 (b)

Question 17 (b) sought views on whether respondents agreed with the proposed development boundary for Church Stretton. The majority of respondents did not agree with the proposed development boundary and made the following comments:

- Respondents objected to the proposed development boundary in Church Stretton because additional development would damage the landscape and beauty of the Shropshire Hills AONB. Respondents also expressed concern over the potential environmental impact as well as the impact on tourism within Church Stretton.
- Several respondents commented that the development boundary should be confined to the town centre with brownfield sites prioritised for development. Some respondents suggested that this would also limit incursion into the AONB.
- Two respondents objected to the development boundary because it omitted Ley Garden.
- One respondent objected to the development boundary due to flood risk concerns. The respondent suggested that sites along the B5477 between World's End, Church Stretton and Little Stretton should be enveloped in the development boundary.
- One respondent stated that the development boundary should remain unchanged to protect the AONB and due to over allocation of residential numbers.

- One respondent stated that SPZ1 (inner zone) and SPZ2 are within the development boundary and there could be potential implications on land use/design. Furthermore, surface pollution could pass into the groundwater system affecting abstraction boreholes.
- Multiple respondents objected to the proposed development boundary and promoted several further sites for inclusion within the development boundary.

One comment was received supporting the proposed development boundary because it incorporates the main built-up area in the town.

4.3. Question 17 (c)

Question 17 (c) sought views on whether the respondents agreed with the preferred housing allocation CST020 in Church Stretton. The majority of the respondents did not support preferred site allocation CST020 and made the following comments.

- The most common reason for objecting was development within the AONB. Respondents stated that the site would cause degradation of the landscape in the Shropshire Hills. The scale and location of development was considered contradictory to the NPPF, one respondent cited NPPF paragraph 172.
- One respondent also stated that the site was partially within the Church Stretton Conservation Area and incompatible with NPPF policies for Conservation Areas.
- Development of the site would have an adverse effect on tourism in Church Stretton with the site being located on the edge of the settlement, near the hills.
- The development boundary should remain unchanged to protect the AONB and due to over allocation of residential numbers. Smaller infill development would be more suited to Church Stretton.
- Church Stretton scores very poorly in the Sustainability Appraisal and the proposed ecology and landscape buffer of the Local Wildlife Site and Ancient Woodland is insufficient. Furthermore, the site is on high ground and will have landscape impacts.
- Environmental concerns were also raised including the loss/damage to trees, impact on Ancient Woodland, intrusion onto wildlife sites such as Helmeth Hill and intrusive earthworks. All of these concerns were considered more significant by respondents because of the site's location within an AONB.
- The development would generate an unacceptable level of traffic because the site is not served by public transport. The distance from services in the town centre would also encourage car use and increase congestion. Pedestrian safety was also a concern owing to the inadequate footway provision.
- The development is too large and will encourage further development up the Stretton Hills.

The respondents who supported the preferred site allocation made the following comments:

- Several respondents supported the proposal but raised concern about inadequate footway provision from the top of Sandford Avenue down to Cwms Lane, as well as other paths that cross the A49.
- One respondent had concerns with drainage and potential flood risk due to development. They suggested a pavement or raised track be put in for road user safety.
- One respondent representing a landowner of adjacent site CST006, said that CST020 in its current form does not take into account site constraints. The respondent suggested a revised development incorporating both sites which would minimise any effect on the AONB and site constraints.

4.4. Question 17 (d)

Question 17 (d) sought views on whether the respondents agreed with the preferred housing allocation CST021 in Church Stretton. The majority of the respondents indicated they did not support the preferred site allocation and made the following comments:

- Respondents objected to the site because it was located in an AONB and would have an unacceptable impact on the setting and landscape of the area.
- The development boundary should remain unchanged to protect the AONB and due to over allocation of residential numbers. Smaller infill development would be more suited to Church Stretton.
- There will be a loss of valuable green space, which used by residents.

- Respondents also expressed concerns that the vehicular access would be unsafe, and the development would generate additional traffic which would worsen highway safety on the existing narrow roads in addition to increasing congestion.
- Several respondents referred back to a previous application on this site which was refused for the aforementioned reasons and could not see how they have been resolved through this proposal.
- The existing footway provision is inadequate and unsuitable for pedestrians.
- One respondent stated that given the cost and burden to the Council, dealing with previously failed applications at this site, it is not sensible to continue to promote this site.

The respondents who supported the preferred site allocation thought that this was a logical addition considering it is built up on three sides although some respondents still expressed concerns about the footway provision and the vehicular access.

5. Further Information

5.1. Question 63

Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified within the Preferred Sites Consultation should be formed or whether any of the existing 'Community Clusters' identified in the consultation document should be removed. Most respondents to this question, who were interested in the Church Stretton Place Plan Area, did not know or had no opinion on Community Clusters. Respondents made the following comments:

- The following settlements were recommended for inclusion as a Community Cluster:
 - Bushmoor, Wall-under-Heywood, Longville, Rushbury, Hope Boulder, All Stretton and Little Stretton.
- One comment suggested that Wall-under-Heywood should be designated as a Community Cluster.
- Several respondents commented that there was insufficient information to answer this question or that they required a definition of a Community Cluster.

No suggestions were received for the removal of a settlement from the Community Clusters.

5.2. Question 64

Question 64 sought any other views. Where appropriate, responses to this question have been consolidated into the relevant specific questions, and have therefore been mentioned in the above sections. Respondents made the following additional relevant comments:

- There is a lack of justification for the 0.5ha minimum threshold for allocating sites in the AONB.
- Respondents suggested that the Council should focus on the tourism industry because traditional industrial units are vacant.
- Future development should be in the 'valleys, not the hills.'
- Identified constraints; flood risk and vehicular access from the A49 need to be challenged and overcome.
- The questionnaire was difficult to understand, and the planning jargon prohibited genuine consultation with the community.
- Energy efficiency requirements should be mandatory for new developments as these features are easier to incorporate during construction.
- A more imaginative approach is required and greater consideration for the quality of the environment. The respondent also identifies an unused site in the town centre which is an eyesore. If this were to be developed residents at this site would not need to use their cars in the town.
- A letter from the Strettons Civic Society supporting Church Stretton Town Council's objection to Planning Application 15/01276/FUL on a site allocated within the existing SAMDev Plan at the Academy was provided. The Council was asked to reconsider CSTRO14, which is land close to the Ley Gardens housing estate as an alternative.
- Respondents believe that Church Stretton has grounds to be treated as a special case because it is situated in an AONB although the respondent didn't specify what the special case entails. Another respondent asked for a national park authority to protect the natural beauty of the area.

- Respondents suggested that the proposals do not follow the guidance in the Council’s document, ‘Church Stretton: A conservation area design guide.’
- A Consultee opposes development which will permanently adversely affect the landscape character and visual amenity in Church Stretton.

Respondents used this question as an opportunity to suggest alternative sites.

- Support for Stretton Civic Society’s proposal for Spring Bank Farm.
- Representation made on behalf of the landowner of the Land at Hall Farm in Wall-under-Heywood for residential development of around 15 dwellings. The respondent has provided supporting technical documentation.
- Sites CST001, CST002, CST008 and CST017 within the Town area and sites CST008, CST031 and CST036 on the southern A49.
- CST035 has considerable potential and flooding has not been of significance in the area. Additionally, the farmland adjoining the B Road including CST005.
- Sites CST034 and CST032 could accommodate 100 dwellings as alternatives to CST020 and CST021.
- Site CST029 received a mixed response:
 - Some supported it being allocated for development as an alternative to existing proposals.
 - Other respondents objected to CST029 and asked for it to be removed from the Appendix D list and added to the Appendix B list of those sites not suitable for development, due to its location in an AONB and road safety concerns (please not this site is located in Appendix A of the SLAA AND this comment maybe erroneous).
- The Strettons Civic Society asks for consideration of CST004 for up to 34 dwellings.
- A representation on behalf of the landowners of CST033 and CST034 ‘Land adjoining Watling Street’ was provided, making the Council aware that the land is available for development
- Church Stretton Town Council asked for sites CST004, CST008, CST029, CST031, CST036 and CST035 to be considered. CST035 should be re-examined as the flood risk is not significant enough to preclude development. Sites CST001 and CST002 could be suitable for windfall development.
- A supporting statement and technical information was provided to demonstrate that site CST028, Land to the north of Cwms Lane/Oaks Road Church Stretton, could accommodate 60 dwellings. A previous application under ref: 14/04374/OUT for 85 dwellings was submitted and withdrawn at this site.
- A representation was made asking for BLC001 in Bushmoor to be considered and supported by a change to the current policy to deliver housing in a sustainable location in accordance with the Development Plans. The same respondent asked Bushmoor to be considered for greater designation than Open Countryside.

Appendices



Appendix A. Quantitative Analysis.

This appendix details the responses provided to the multiple-choice questions posed for the Church Stretton Place Plan Area:

A.1. Question 3

Question 3 sought views on whether Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing. Of the unique respondents that responded to this question, who were interested in the Church Stretton Place Plan Area, and completed this question:

- 30% agreed with the introduction of a cross-subsidy exception site policy;
- 38% did not agree with the introduction of a cross-subsidy exception site policy; and
- 32% responded don't know/ no opinion on the introduction of a cross-subsidy exception site policy.

A.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) if development mix should be assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of the findings of a viability assessment undertaken as part of the Local Plan Review. Of the unique respondents that responded to this question, who were interested ins about the Church Stretton Place Plan Area, and completed this question:

- 15% preferred a set development mix option;
- 85% preferred a development mix to be assessed on a site by site option.

A.3. Question 5

Question 5 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines. Of the unique respondents that responded to this question, who were interested ins about the Church Stretton Place Plan Area, and completed this question:

- 73% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline;
- 7% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline; and
- 20% responded don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline.

A.4. Question 6

Question 6 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines. Of the unique respondents that responded to this question, who were interested ins about the Church Stretton Place Plan Area, and completed this question:

- 72% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline;
- 10% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline; and
- 18% responded don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline.

A.5. Question 17 (a)

Question 17 (a) sought views on whether respondents agreed with the preferred housing and employment guidelines for Church Stretton. Of the unique respondents that completed this question:

- 11% agreed with the preferred housing and employment guidelines for Church Stretton;
- 60.8% did not agree with the preferred housing and employment guidelines for Church Stretton; and
- 29% don't know/ no opinion on the preferred housing and employment guidelines for Church Stretton.

A.6. Question 17 (b)

Question 17 (b) sought views on whether respondents agreed with the proposed development boundary for Church Stretton. Of the unique respondents that completed this question:

- 6% agreed with the proposed development boundary for Church Stretton;
- 70% did not agree with the proposed development boundary for Church Stretton; and
- 24% don't know/ no opinion on the proposed development boundary for Church Stretton.

A.7. Question 17 (c)

Question 17 (c) sought views on whether respondents agreed with the preferred housing allocation CST020 in Church Stretton. Of the unique respondents that completed this question:

- 7% agreed with the preferred housing allocation CST020 in Church Stretton;
- 68% did not agree with the preferred housing allocation CST020 in Church Stretton; and
- 25% don't know/ no opinion on the preferred housing allocation CST020 in Church Stretton.

A.8. Question 17 (d)

Question 17 (d) sought views on whether respondents agreed with the preferred housing allocation CST021 in Church Stretton. Of the unique respondents that completed this question:

- 9% agreed with the preferred housing allocation CST021 in Church Stretton;
- 62% did not agree with the preferred housing allocation CST021 in Church Stretton; and
- 29% don't know/ no opinion on the preferred housing allocation CST021 in Church Stretton.

A.9. Question 63

Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified in within the Preferred Sites Consultation Document should be formed, or any of the existing 'Community Clusters' identified within the Preferred Sites Consultation Document should be removed. Of the unique respondents that responded to this question, who were interested in about the Church Stretton Place Plan Area and completed this question:

- 14% agreed that additional Community Clusters should be added;
- 4% agreed that additional Community Clusters should be removed;
- 9% disagreed that additional Community Clusters should be added or removed; and
- 73% did not know / had no opinion.

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