# Shropshire Council: Shropshire Local Plan



# 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:	The Fletcher Sund	orne Partnership		
21. To which document does this representation relate?				
Regulation 19: Pre-Submission Draft of the Shropshire Local Plan				
Sustainability Appraisa 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: Po	licy: S16.1 Shrewsbury	Site: SHR054a	Policies Map: Shrewsbury	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:				
A. Legally compliant		Yes:	No:	
B. Sound		Yes:	No: 🗹	
C. Compliant with the Duty to Co-operate (Please tick as appropriate).		Yes:	No:	
24. 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.

#### S16.1. Development Strategy: Shrewsbury Strategic Centre

Fletcher Estates supports Policy S16.1 and its proposed allocations. As the county's strategic centre, Shrewsbury is an appropriate location to accommodate growth. Land within the town's bypass offers some of the most sustainable locations for development anywhere in the county, with close proximity of plentiful employment opportunities and a very wide range of services and facilities.

#### Allocation SHR054a

Fletcher Estates strongly supports the allocation of site SHR054a (land south of Sundorne Road) for residential development for the reasons set out in **Appendix 1** to this representation. There is however an internal conflict between the Plan's

policies DP1, SP1 and SP5 and the residential guideline figure for the site, which fails the 'justified' test of soundness. The proposed low site density also fails the 'consistent with national policy' test of soundness.

#### Guideline figure fails the 'consistent with national policy' test

Section 11 of the National Planning Policy Framework requires Plans to encourage effective use of land. Paragraph 122 states that, "*Planning policies and decisions should support development that makes efficient use of land,"* subject to various considerations.

Having regard to the characteristics of the area, Shropshire Council recently allowed Galliers Homes' development of 20 dwellings on 0.60 hectares of land to the north of the site. This density of 33 dwellings per hectare is entirely appropriate for a development in this area.

Allocation SHR054a is 3.86 hectares in size. The proposed guideline figure of only 60 dwellings is equivalent to a density of only 15.8 dwellings per hectare. We acknowledge that some of the site will be needed for additional car parking for the Shrewsbury Club to compensate for the land-take of the access road, however this does not justify such a large departure from previous densities and fails the 'consistent with national policy' test of soundness.

#### Guideline figure fails the 'justified' test

Policy SP1 (The Shropshire Test) requires development which, "*makes efficient use of land*" and Policy SP5 (High-Quality Design) includes in section k a requirement to make, "*efficient and effective use of land and topography*". The proposed density of 15.8 dwellings per hectare for site SHR054a is inconsistent with Policies SP1 and SP5.

The Council's own evidence base supports a higher density. The Council applied a density of 30 dwellings per hectare when it assessed the indicative capacity for site SHR054a of 116 dwellings on page 128 of the Shrewsbury Site Assessments.

The requirement to provide additional parking for the Shrewsbury Club site does not justify such a large reduction from 116 dwellings to only 60 dwellings, particularly when the impact of Policy DP1 (Residential Mix) is factored in.

Policy DP1 (Residential Mix) requires 25% of the open market dwellings to be twobedrooms or less and at least a further 25% to be three-bedrooms or less. Policy DP1 also requires sites of over 50 dwellings to include a range of specialist housing to meet the needs of older people, such as retirement living apartments. These requirements will reduce the average size of dwellings significantly.

We estimate that the emerging policies will bring the average floorspace down to around 85sqm. The 2016 indicative layout plan (attached in Appendix 1 to this representation) assumed 68 dwellings with an average floorspace of around 115sqm per dwelling. To achieve the same floorspace as shown in the indicative layout plan at these smaller sizes, there would need to be at least 92 dwellings on the site.

In light of Policy DP1 and the proposed Development Guidelines and their requirement for compensatory car parking for the Shrewsbury Club, an appropriate site guideline would be 85 dwellings, equivalent to a net density of 22 dwellings per hectare.

Office Lles Oply	Part A Reference:		
Office Use Only	Part B Reference:		

#### Deliverability

Assuming the above guideline of around 85 dwellings, we can confirm that the site will be highly deliverable and viable. There is strong interest from housing developers and the site is likely to be delivered within 3 years of adoption of the Plan.

Access rights through the Shrewsbury Club site have already been secured. The development guidelines should be updated to reflect this fact.

(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.

To ensure the Plan meets the 'justified' and 'consistent with national policy' tests of soundness, the following modification is necessary to the guideline figure, increasing it from 60 to 85 dwellings. Access rights have also been secured and the development guidelines should reflect this fact.

Site Allocation	Development Guidelines	Provision	
Land south of Sun- dorne Road, Shrewsbury (SHR054a)	Development is subject to an appropriate vehicular access <b>being secured</b> from Sundorne Road, which includes the po- tential for access across the current Shrewsbury Club car park. In this case there is a requirement for compensatory car parking to be delivered on site. All necessary improve- ments to the local and strategic road network will be un- dertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including con- sideration of cumulative impact).	<del>60-<u>85</u> dwellings</del>	
	Development will provide a pedestrian route from the Shropshire Way footpath to Sundorne Road as part of its green infrastructure contribution, which will also include effective native planting in order to create a suitable visual buffer to the former Shrewsbury Canal and the environ- mental network which surrounds the site. In undertaking these works care should be taken not to compromise any potential future restoration of the Canal.		
	Mature trees, hedgerows and priority habitats will be re- tained, forming part of the green infrastructure network. Where appropriate it will also be enhanced and expanded to create a sustainable juxtaposition between the built and natural form.		
	Site design and layout will reflect and respect the sites heritage and heritage assets within the wider area. The development will provide sufficient screening in line with a site-specific landscape impact assessment, in order to		

Office Use Only	Part A Reference:
Office Use Only	Part B Reference:

mitigate any identified harm to long and short distance views. In doing so, development will need to be viewed within the context of its surrounding uses and features, and ensure they are not compromised. These include Pimley Manor to the south, the Shrewsbury Club to the north, the A49 to the east and Sundorne playing fields to the west.
Acoustic design, layout, green infrastructure and appropri- ate building materials will be used to appropriately manage noise, particularly associated with the A49.
The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

(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:

**Discussions about this site's proposed development guidelines should** include the Fletcher Sundorne Partnership, who will be able to update the Inspector with regard to the latest situation on the site layout, access and parking arrangements, and on discussions with other parties.

(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.

Signature:

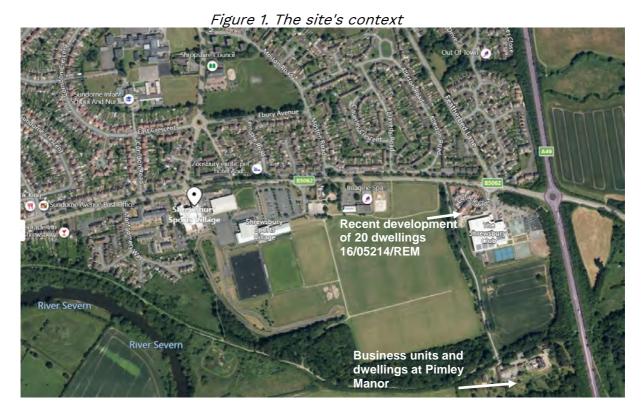
H. Howie

Date: 27/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

# Appendix 1: Site SHR054a

The site comprises under-utilised agricultural land lying between the A49 Shrewsbury bypass and the Shrewsbury Sports Village playing fields. To its north is a recent residential development of 20 homes and the Shrewsbury Club Gymn. To its south are a mix of business units and dwellings in converted buildings at Pimley Manor. The site is screened by mature woodland on its eastern and southern boundaries.



Fletcher Estates strongly supports the allocation of land south of Sundorne Road (SHR054a) for residential development for the following reasons:

- it provides a better balance of residential development across the town, being one of only two sites north of the river and the only new allocation on the eastern side of Shrewsbury;
- it enhances Shrewsbury's ability to deliver its housing requirement and reduces the Plan's reliance on unidentified windfall sites;
- it is sustainably located close to a range of existing services and facilities including schools, doctors, shops, public transport and a very good range of sports and health facilities within easy walking distance as detailed in Appendix 1 to this representation;
- development of the site will provide a pedestrian route from the Shropshire Way footpath along the river to Sundorne Road as part of the site's green infrasturucture contribution, thereby enhancing the town's network

- it makes better use of currently under-utilised land in accordance with paragraph 118d of the National Planning Policy Framework, with housing providing a more effective land use than an isolated agricultural parcel separated from other farmland by the town's bypass;
- the Landscape Report confirms that the site will have an acceptable impact on the wider landscape.

#### Access

The site is accessed off Sundorne Road via the mini-roundabout serving the Shrewsbury Club access road. The draft Access Arrangements Plan on page 4 illustrates how the access could be accommodated.

#### Landscape Assessment

The detailed Landscape Assessment attached at **Appendix 2** confirms that the site is well suited to development, finding that the site,

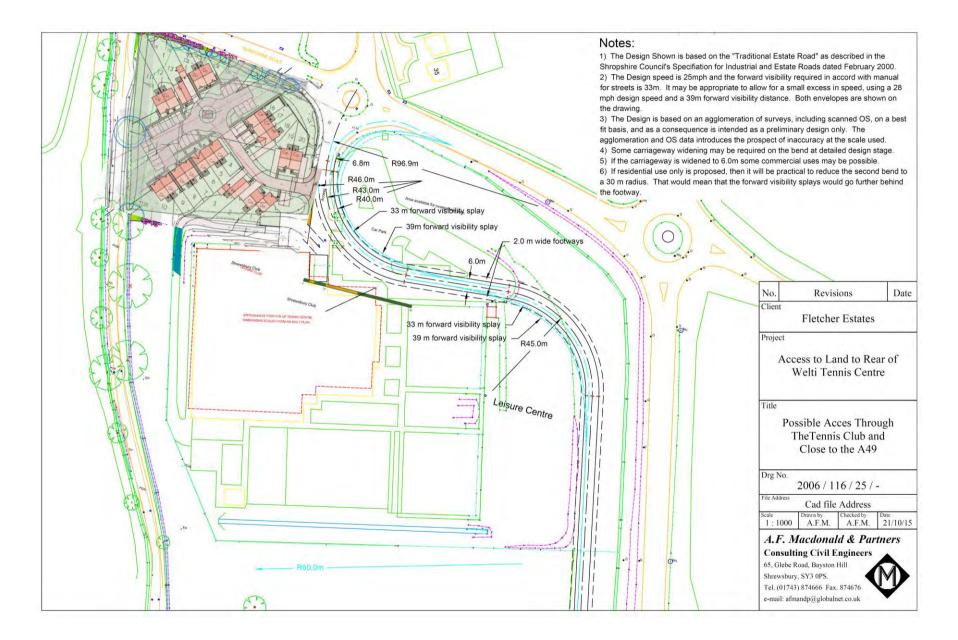
"is isolated from the wider countryside to the east by the treelined A49 corridor. It is distinctly separate from and different in character to the Sundorne playing fields to the west. It does not form part of the Sundorne Canal local wildlife site and it does not feature in any of the views along the River Severn identified as being important in the LVSA. There does not therefore appear to be any justification for treating the land at Sundorne Road as having high landscape sensitivity to new housing at a site specific level. In fact our own study has demonstrated that the low lying ground combined with the strong perimeter tree cover would enable the site to absorb a new residential development on the scale proposed without giving rise to unacceptable effects on the character of the wider landscape."

The Council's Landscape and Visual Sensitivity Assessment (LVSA) recognises that "A variety of views are experienced throughout this parcel, those which are most highly valued are long ranging or which encompass distinctive Local Wildlife Sites that offer a valuable visual connection to nature in contrast with the urban edges of Shrewsbury." These do not relate to site SHR054a, which is neither part of the long-ranging views of Haughmond Hill, nor part of the view of the wildlife site to its south along the river bank.

The LVSA notes that pockets on, "*the urban edge are of lower value, quality and character.*" Site SHR054a is one of these lower value pockets. It is entirely appropriate for inclusion within the development boundary due to its sustainable location offering residents excellent accessibility to services and facilities in Shrewsbury.



Potential layout plan 2016 - NB. Illustrative only; assumes larger dwellings.



Appendix 2: Landscape Report



## LAND OFF SUNDORNE ROAD, SHREWSBURY

LANDSCAPE REPORT

Prepared for:

Fletcher Sundorne Partnership

Prepared by:

Allan Moss Associates Ltd

September 2019

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#### REFERENCES

#### APPENDICES

- A Location Plan
- B Illustrative Layout (not to scale)
- C Aerial Photographs (June 2018)
- D Photographs 1 to 10
- E Public Rights of Way
- F Visual Receptor Plan
- G Extracts from Shropshire Landscape Typology 2006

- Η
- Extracts from Shropshire Landscape & Visual Sensitivity Assessment 2018: Study Area Shrewsbury E [01SHR-E] Extracts from Shropshire Landscape & Visual Sensitivity Assessment 2018: Assessment Methodology and Summary Ι

#### **1.0 INTRODUCTION**

#### **1.1 Summary of Proposals**

- 1.1.1 The Fletcher Sundorne Partnership is promoting land off Sundorne Road, Shrewsbury for residential development through the Shropshire Local Plan review process.
- 1.1.2 The site covers an area of approximately 3.58ha on the eastern edge of Shrewsbury as indicated on the Location Plan at Appendix A. A development of approximately 68 dwellings is envisaged, including 0.6ha of public open space. Access would be from Sundorne Road through the adjacent Shrewsbury Club car park.
- 1.1.3 A copy of the Illustrative Layout for the proposed development, prepared by Berrys, is provided at Appendix B.

#### 1.2 Scope of Report

- 1.2.1 This Landscape Report provides an evidence base to inform the Local Plan review from a landscape character and visual amenity perspective. In particular the report covers the following matters:
  - Description of the site and the surrounding locality; a summary of the overall visibility; and the identification of potential visual receptor locations relevant to the proposed development.
  - Identification of relevant landscape character classifications.
  - Consideration of landscape sensitivity matters such as the relationship to the existing settlement, existing landform and vegetation, proximity of sensitive landscape features and landscape value.
  - Consideration of the potential effects of the proposed development in terms of landscape character and visual amenity.
  - Reviewing and responding to the Shropshire Landscape & Visual Sensitivity Assessment (LVSA) with respect to this site.
- 1.2.2 The report has been prepared by Allan Moss who is a chartered landscape architect and town planner with over 39 years' experience in both private and public sectors.
- 1.2.3 The site and the local area was visited in August 2019 for the purpose of preparing this report.
- 1.2.4 A list of references is given at the end of this report and the various plans and photographs referred to are included as appendices. All the photographs, apart from aerial views, have been taken with a Canon EOS 5D MkIII DSLR camera (full frame sensor) fitted with a fixed 50mm lens. Photograph locations are indicated on the plan at Appendix F.

#### 2.0 LANDSCAPE & VISUAL BASELINE

#### 2.1 Description of Site and Surrounding Locality

- 2.1.1 The site is located on the eastern edge of Shrewsbury to the south of Sundorne Road as indicated on the location plan at Appendix A. It consists of a single field currently in arable use. Historical maps indicate that this field is what remains of a much larger field which was severed by the construction of the A49 bypass in the early 1990s and then partly developed to the north by a leisure centre facility in the early 2000s (now The Shrewsbury Club).
- 2.1.2 The land sits between the 50m 60m contours as indicated on the OS base at Appendix A and slopes gently in a north to south direction towards the River Severn.
- 2.1.3 Existing features on the site and in the wider landscape are illustrated on the aerial photographs at Appendix C, which date from June 2018. Internal views of the site are illustrated in Photographs 1 & 2 at Appendix D. Views towards the site from the surrounding locality are illustrated in Photographs 3 to 10.
- 2.1.4 The site is bounded to the north by the Shrewsbury Club which includes a leisure centre building, outdoor tennis courts and associated car parking. The A49 runs immediately to the east but there is a strong tree belt along this boundary that provides a buffer between the site and the road. Pimley Manor, which includes mixed commercial and residential uses, lies to the south. Again there is a mature tree belt along the southern boundary of the site that provides a buffer to Pimley Manor. To the west the site is bounded by the private access road to Pimley Manor which is flanked by mature hedgerows and trees. Further to the west lie the playing fields of Shrewsbury Sports Village (also known as Sundorne playing fields).
- 2.1.5 There is a public footpath (0435/3) running just inside the site along the southern boundary, although this does not appear to be well used as there is a much better bridleway route (0435/UN1) running just outside the southern boundary along the line of a disused canal. This forms part of the Shropshire Way and appears to be popular with walkers and cyclists. These routes and other public rights of way in the local area are indicated on the plan at Appendix E.
- 2.1.6 There is a low voltage power line crossing the western part of the site in a north/south direction. These electricity poles provide useful reference points when identifying the site in views from the west.
- 2.1.7 North of the River Severn the A49 essentially separates the urban area of Shrewsbury to the west from the rural area to the east. The site is the only remnant of agricultural land remaining to the west of the A49 in an area otherwise dominated by recreational uses and built development.

#### 2.2 Overall Visibility

- 2.2.1 The general extent of visibility is represented by the visual envelope on the Visual Receptor Plan at Appendix F which has been established by way of desk study and detailed observations in the field.
- 2.2.2 The site is well contained visually to the north by the Shrewsbury Club leisure centre facilities and to the south and east by established tree belts. The site is more open to view from the west in the vicinity of the Sundorne playing fields but even there views are restricted by the tree belts to the south of the playing fields and the sports centre buildings to the north. Views towards the site are also filtered by the trees along the private access road to Pimley Manor.
- 2.2.3 The main publicly accessible views of the site are from Footpath 0435/3 which runs just inside the southern boundary as illustrated in Photograph 2 at Appendix D. There is a view of the site from the Shropshire Way just to the south-west where it crosses the access road to Pimley Manor (Photograph 3), but more generally the site is well screened from the Shropshire Way by the intervening vegetation with only glimpses through the foliage as illustrated in Photograph 4. Such views of course are likely to be more open in winter when there are no leaves on the trees.
- 2.2.4 In views from the Sundorne playing fields to the west the site is well tucked in amongst the foreground trees and hedgerows along the access road to Pimley Manor and the background trees along the A49 as illustrated in Photographs 5 & 6.
- 2.2.5 There are no views of the site from the A49 and only minor glimpses from Sundorne Rd from breaks in the boundary vegetation around the Sundorne Club as illustrated in Photograph 7.
- 2.2.6 There is a potential long distance view from Haughmond Hill to the south-east, as illustrated in Photograph 8, but the site is still largely screened from this direction by the perimeter tree belts to the south and east. There are no views of the site from south of the River Severn due to the intervening tree cover as illustrated in Photographs 9 & 10.
- 2.2.7 The only private dwellings visible from the site are two properties on the recently completed Coracle Close development to the north of the Shrewsbury Club as illustrated in Photograph 2, but their views are primarily towards the leisure centre.

#### 2.3 Visual Receptors

2.3.1 The main visual receptor locations with potential views of the site are listed in Table 1 below. Each location is numbered and can be cross referenced to the Visual Receptor Plan at Appendix F.

Table 1: Relevant Visual Receptor Locations				
Ref	Receptor Location	Distance from Site	Elevation (AOD)	Comments
	Public locations with views of site:			
1	Footpath 0435/3	Within	55m	Open views as it crosses site (Photo 2)
2	Shropshire Way	15-25m	55m	Intermittent partial and filtered views (Photos 3 & 4)
3	Sundorne Playing Fields	20-450m	55-62m	Filtered short and middle distance views (Photos 5 & 6)
4	Sundorne Road	150-220m	60-62m	Partial middle distance views (Photo 7)
5	Haughmond Hill	1.5km	120-140m	Elevated long distance view (Photo 8)
	Private dwellings with views of site:			
6	Coracle Close	150m	61m	Potential partial view.
NB. El	levations for receptor locations cor	npare with an eleva	ation of 50-60m AC	DD for the site.

#### 3.0 LANDSCAPE CHARACTER CLASSIFICATIONS

#### 3.1 National Landscape Character Classifications

- 3.1.1 Natural England has published a national study describing broad areas of distinct landscape character. These national character areas provide a useful framework within which more detailed local studies can be carried out.
- 3.1.2 The site is located at the southern end of National Character Area 61: Shropshire, Cheshire and Staffordshire Plain<sup>1</sup>.

#### 3.2 Shropshire Landscape Typology 2006

- 3.2.1 Within Natural England's broad framework of national character areas the Shropshire Landscape Typology<sup>2</sup> provides a more detailed level of classification. This study classifies the site as falling within the 'Principal Timbered Farmlands' landscape type. Details of this landscape type are provided at Appendix G.
- 3.2.2 The key landscape characteristics of the 'Principal Timbered Farmlands' are identified as:
  - Rolling lowland with occasional steep sided hills
  - Relic ancient woodland
  - Hedged fields with scattered hedgerow trees
  - Predominantly dispersed settlement pattern
  - Small to medium scale landscapes with filtered views

#### 3.3 Shrewsbury & Atcham Landscape Sensitivity & Capacity Study 2007

3.3.1 The Shrewsbury & Atcham Landscape Sensitivity & Capacity Study<sup>3</sup> formed part of the evidence base for the Shropshire SAMDev Plan 2006-2026. It considered many potential development sites around Shrewsbury and the rural settlements in terms of their suitability for accommodating development from a landscape character perspective. However it did not consider the land off Sundorne Road.

#### 3.4 Shropshire Landscape & Visual Sensitivity Assessment 2018

- 3.4.1 The Shropshire Landscape & Visual Sensitivity Assessment<sup>4</sup> forms part of the evidence base for the current Shropshire Local Plan Review. It comprises a series of documents which assess the landscape and visual sensitivity of individual towns and villages and provide design guidance for those settlements.
- 3.4.2 This document includes the land off Sundorne Road within study area Shrewsbury E [01SHR-E]. The sensitivity of Shrewsbury E as a whole to

change arising from new housing is assessed in this document as high whilst its visual sensitivity to new housing is assessed as medium-high. Relevant extracts are provided at Appendix H.

#### 4.0 LANDSCAPE SENSITIVITY CONSIDERATIONS

#### 4.1 Relationship to Existing Settlement

4.1.1 The site relates more closely to the urban area of Shrewsbury than the countryside to the east of the A49. It is bounded by existing development to the north at the Shrewsbury Club and to the south at Pimley Manor. The open land to the west is all in recreational use. The site is now the only remnant of agricultural land north of the river and west of the A49. It is both physically and visually separate from the countryside to the east due to the strong tree belts lining either side of the road.

#### 4.2 Landform and Vegetation

- 4.2.1 The site occupies gently sloping ground on the northern side of the River Severn. It is bounded by established tree belts to the south and east and a mature hedgerow with trees along its western boundary. The only existing trees within the site are two Oaks near the northern boundary.
- 4.2.2 It is evident from the photographs at Appendix D that the low lying ground combined with strong tree cover enables the site to sit discretely within its surroundings. It should therefore be capable of absorbing a new residential development on the scale proposed without giving rise to unacceptable landscape and visual effects on the wider countryside.

#### 4.3 **Proximity of Sensitive Landscape Features**

- 4.3.1 The Shropshire Environmental Network Map indicates that the route of the disused canal (now part of the Shropshire Way) which runs just to the south of the site forms part of the Sundorne Canal Local Wildlife Site. However the mature tree belt along the southern site boundary provides a buffer between the site and the former canal route.
- 4.3.2 The Historic England Web site indicates that there are no listed buildings or scheduled monuments in close proximity to the site. The nearest listed buildings are at Uffington, approximately 750m to the south-east, but none of these are visible from the site.

#### 4.4 Landscape Value

- 4.4.1 There are no national or local landscape designations affecting the site.
- 4.4.2 The adopted SAMDev Plan indicates the land as being outside the development boundary for Shrewsbury in open countryside and partially within a mineral safeguarding zone.

4.4.3 Given that the site has become isolated from the wider countryside to the east its landscape value is limited. Although there is a public right of way running just inside the southern site boundary this is unlikely to be well used as it is overgrown with vegetation at its western end. The Sundorne playing fields to the west are of much greater value as a local recreational resource as is the disused canal corridor to the south which has both local recreational and wildlife value.

#### 5.0 POTENTIAL LANDSCAPE & VISUAL EFFECTS

#### 5.1 **Potential Effects on Existing Landscape Features**

- 5.1.1 The proposed development would result in the loss of approximately 3.58ha of arable farmland. However the field is of limited agricultural value given its isolation from other farmland. Agricultural vehicles currently have to enter the urban area of Shrewsbury in order to access the site.
- 5.1.2 The indicative layout at Appendix B demonstrates that all the existing trees within and around the site are capable of being retained as part of the development.
- 5.1.3 Where existing trees are to be retained they should be subject to a full arboricultural inspection for safety. All existing trees and hedges to be retained should be fully fenced and protected prior to the commencement of any works in accordance with BS5837 (2012) 'Trees in relation to design, demolition and construction Recommendations'.

#### 5.2 **Potential Effects on Landscape Character**

- 5.2.1 At a site level there would inevitably be a change in character from an arable field to residential use should the site be developed. However the development would be discretely located on low lying land bounded to the north by the existing leisure centre development; to the south by the Pimley Manor development and to the east by the A49 road corridor. Although the land to the west is in open use as playing fields, this is quite different in character to the countryside to the east.
- 5.2.2 The retention of the perimeter tree belts and hedgerows would also help to screen and soften the effect of development on the surrounding locality.
- 5.2.3 In addition, it is assumed that any development on this site would also be subject to the normal open space and landscaping requirements for new residential development.

#### **5.3** Potential Effects on Visual Amenity

- 5.3.1 Potential visual receptor locations that may be affected by the proposed development are identified in Table 1 above and on the visual receptor plan at Appendix F. The visual effect of the proposed development from these locations is considered below.
- 5.3.2 There would clearly be close up views of the proposed development from Footpath 0435/3 which passes through the site along the southern boundary. Whilst this route could be incorporated into the emerging layout in an

appropriate manner it is questionable as to whether that would really be necessary given the proximity of the Shropshire Way which provides a much better alternative.

- 5.3.3 As explained in Section 2.0 above the site is already well screened from the Shropshire Way by the intervening vegetation with only glimpses through the foliage as illustrated in Photographs 3 & 4. The effectiveness of the southern tree belt screening could be improved, particularly in winter, by the planting of evergreen understorey species on the southern edge of the development.
- 5.3.4 The proposed development would be visible from the Sundorne playing fields to the west as demonstrated in Photographs 5 & 6, but it would sit low in the landscape against the backdrop of existing tree cover and it would also benefit from the softening effect of existing trees and hedgerows along the access road to Pimley Manor in the foreground.
- 5.3.5 Any views from Sundorne Road would be extremely limited as demonstrated in Photograph 7 and the development would always be seen in the context of the Shrewsbury Club development from this direction.
- 5.3.6 Photographs 9 & 10 demonstrate that there would not be any views of the proposed development from south of the River Severn due to the intervening tree cover. The only potential long distance view of the site would be from Haughmond Hill, approximately 1.5km to the south-east as illustrated in Photograph 8. Although the site is largely screened from this direction by the perimeter tree belts to the south and east the roofs of the new dwellings are likely to be visible amongst the trees. However these would be seen in the context of the adjacent Shrewsbury Club development and against the backdrop of the urban area of Shrewsbury.
- 5.3.7 The only private dwellings with potential views of the proposed development would be two properties on the recently completed Coracle Close development approximately 150m to the north but their views are primarily towards the Shrewsbury Club leisure centre building.

#### 6.0 RESPONSE TO SHROPSHIRE LANDSCAPE & VISUAL SENSITIVITY ASSESSMENT

#### 6.1 General

- 6.1.1 As explained in Section 3.4 the Landscape & Visual Sensitivity Assessment (LVSA) prepared by Gillespies<sup>4</sup> for Shropshire Council includes the land off Sundorne Road within study area Shrewsbury E [01SHR-E]. Study area Shrewsbury E covers a broad tract of land from Telford Way (A5112) in the west to the edge of Haughmond Hill in the east.
- 6.1.2 The sensitivity of Shrewsbury E as a whole to change arising from new housing is assessed in this document as high whilst its visual sensitivity to new housing is assessed as medium-high. Relevant extracts are provided at Appendix H.
- 6.1.3 However the introduction to the LVSA Methodology document prepared by Gillespies also states:

"This is a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist)."

The relevant extract is provided at Appendix I.

6.1.4 It is clear therefore that the broad-brush findings of the LVSA are not intended to be applied at a site specific level without a more detailed level of study.

#### 6.2 Landscape Sensitivity

6.2.1 The reasons given in the LVSA for a landscape sensitivity assessment of high are:

"The landscape sensitivity of this parcel is greatly increased due to areas of high recreational value, in particular to the west where the landscape makes an important contribution to the enjoyment of the area. Although the landscape to the east offers less in terms of recreational value, this part of the parcel is valued in terms of its setting to Hangmond Hill. Overall the sensitivity of the landscape to change arising from new housing is high and to employment is very high."

6.2.2 This statement reflects our own finding that there is a distinct change in character between the land to the west of the A49 which is essentially urban fringe and the land to the east of the A49 which is essentially rural. In the west, high recreational value is identified as making an important contribution to the enjoyment of the area. In the east the setting of Haughmond Hill is identified as being the most important aspect.

- 6.2.3 The LVSA design guidance diagram at Appendix H includes the land at Sundorne Road within a zone of higher landscape sensitivity to development but there is no specific mention as to why this site is important. Most of the features highlighted as being important to the west of the A49 relate to recreational facilities, recreational routes and wildlife sites. The main views highlighted as being important are those along the River Severn.
- 6.2.4 The land at Sundorne Road represents the remains of what was once a much larger agricultural field. It is bounded by existing development at the Shrewsbury Club to the north and Pimley Manor to the south. It is isolated from the wider countryside to the east by the tree-lined A49 corridor. It is distinctly separate from and different in character to the Sundorne playing fields to the west. It does not form part of the Sundorne Canal local wildlife site and it does not feature in any of the views along the River Severn identified as being important in the LVSA.
- 6.2.5 There does not therefore appear to be any justification for treating the land at Sundorne Road as having high landscape sensitivity to new housing at a site specific level. In fact our own study has demonstrated that the low lying ground combined with the strong perimeter tree cover would enable the site to absorb a new residential development on the scale proposed without giving rise to unacceptable effects on the character of the wider landscape.

#### 6.3 Visual Sensitivity

6.3.1 The reasons given in the LVSA for a visual sensitivity assessment of mediumhigh are:

"People within the parcel have a variety of views, some of which are highly valued. Pylon towers within this parcel, and within adjacent parcels D and F, locally detract from views in the east. The relative numbers of receptors within the parcel is high and varied in type; this combined with general visibility means views experienced are of medium-high sensitivity to change arising from new housing and high sensitivity to change arising from employment."

- 6.3.2 The assessment of medium-high visual sensitivity appears to relate primarily to the high numbers of receptors in this locality including users of the Shropshire Way, visitors to the various recreational facilities and travellers along the A49 bypass. The LVSA design guidance diagram at Appendix H indicates that the land at Sundorne Road does not fall within any of the areas identified as having higher visual sensitivity to development. The important views that need to be protected are indicated as those along the River Severn.
- 6.3.3 Given the numerous recreational facilities available in this locality and its proximity to the urban area it is not surprising that there are a lot of recreational visitors. Whilst the LVSA findings may be useful at a strategic level the suitability of individual sites for housing allocation needs to be considered at the site specific level. In this study we have identified those specific visual

receptor locations relevant to the land at Sundorne Road. The site is not visible from the A49 and it is not visible from south of the River Severn. Any views from the Shropshire Way are heavily filtered by intervening vegetation (Photographs 3 & 4). There are views from the Sundorne playing fields but from this direction the site sits low in the landscape against the backdrop of existing tree cover with further trees and hedgerows along the access road to Pimley Manor in the foreground (Photographs 5 & 6). Whilst there is a long distance view from Haughmond Hill (Photograph 8) the site is still largely screened from this direction by the perimeter tree belts to the south and east.

6.3.4 There does not therefore appear to be any justification for treating the land at Sundorne Road as having medium-high visual sensitivity to new housing at a site specific level. Our own site specific study has demonstrated that this land is capable of accommodating residential development without giving rise to unacceptable effects on the visual amenity of the surrounding locality.

#### 6.4 Conclusion

- 6.4.1 The LVSA acknowledges that it is a strategic level assessment aimed at providing context for more detailed site specific studies. It does not make any judgements on the appropriateness of specific developments on individual sites.
- 6.4.2 This landscape report has considered the land at Sundorne Road on a site specific level and concludes that it is capable of absorbing a new residential development on the scale proposed without giving rise to unacceptable landscape and visual effects on the wider countryside.
- 6.4.3 We do not consider that the LVSA assessments of high landscape sensitivity and medium-high visual sensitivity for study area Shrewsbury E as a whole are applicable at a site specific level to the land at Sundorne Road.

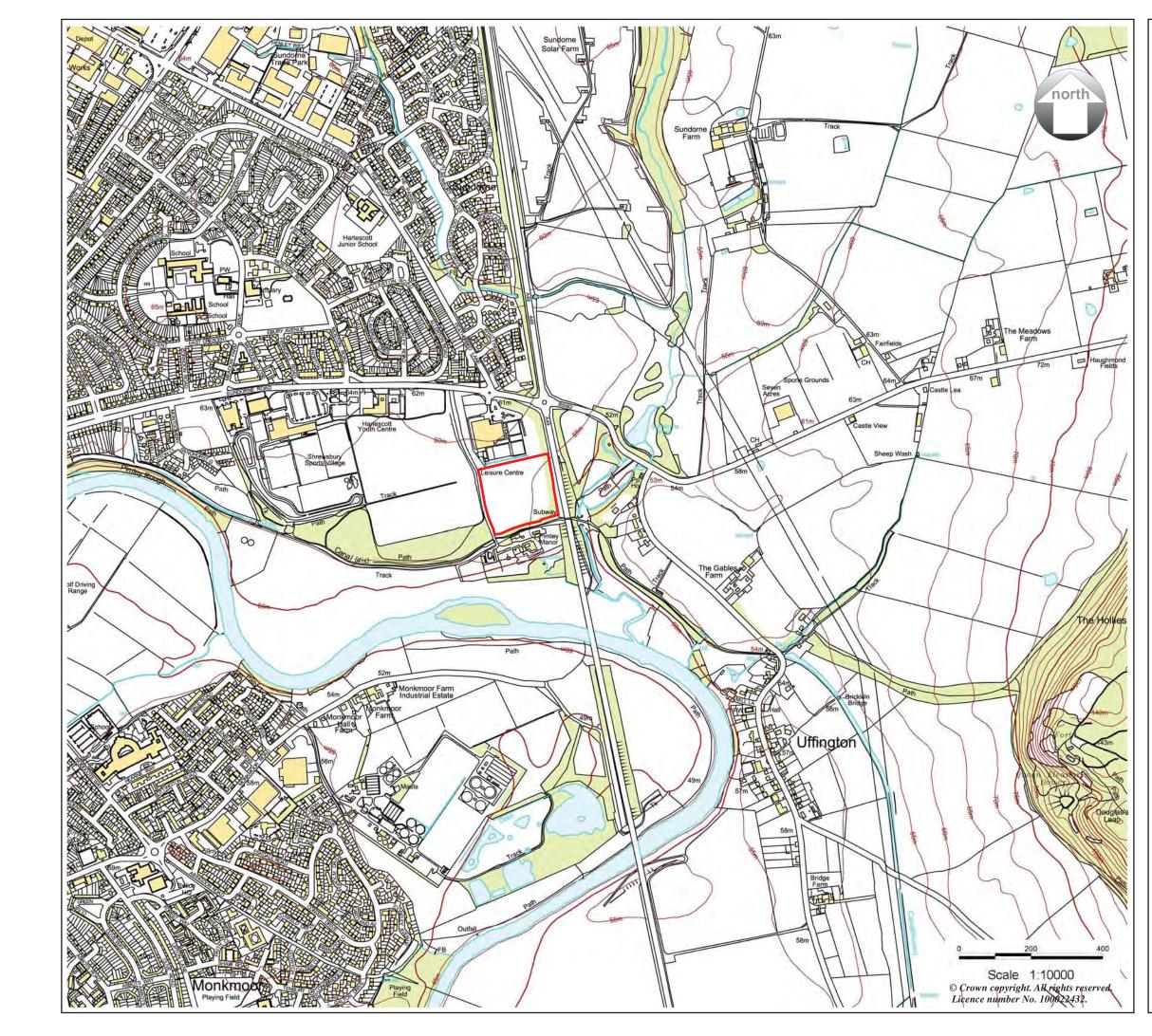
Allan Moss BA (Hons), BPl, MRTPI, Dip LA, CMLI September 2019

#### REFERENCES

- National Character Area Profile: 61. Shropshire, Cheshire & Staffordshire Plain Natural England 2014
- 2. The Shropshire Landscape Typology. Shropshire County Council September 2006
- Shrewsbury & Atcham Landscape Sensitivity & Capacity Study 2007 White Consultants for Shrewsbury & Atcham BC July 2007
- 4. Shropshire Landscape & Visual Sensitivity Assessment Gillespies for Shropshire Council November 2018

# APPENDIX A

**Location Plan** 



KEY: Site Location	
Job: Land off Sundorn Shrewsbury	ne Road,
Title: Location Plan	
Scale: 1:10,000	Date: Sept 2019
Drawing No: 1530.01	Rev:
	ASSOCIATES LTD ng and Landscape Design

## **APPENDIX B**

Illustrative Layout (not to scale)



## **APPENDIX C**

Aerial Photographs (June 2018)

The Shrewsbury Club

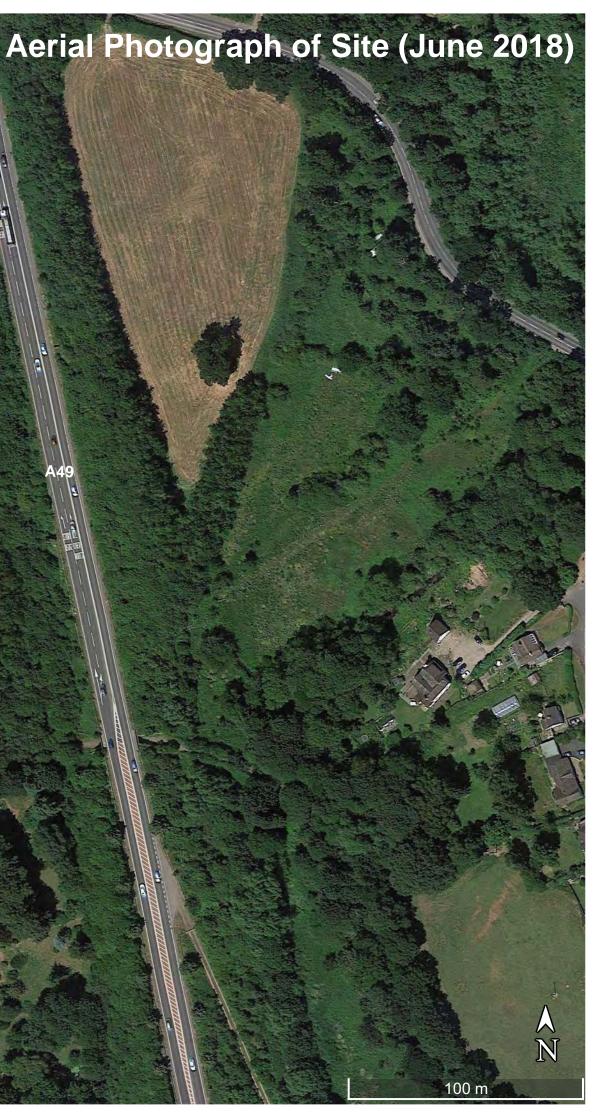
03.338

Sundorne Playing Fields

C.h.s.

Site

**Pimley Manor** 





# **APPENDIX D**

Photographs 1 to 10



Photograph 1: Internal view of site from north-west corner of field.



Photograph 2: Internal view of site from south-west corner of field on line of Footpath 0435/3.



Photograph 3: View from Shropshire Way looking north-eastwards.



Photograph 5: View from Sundorne Playing Field looking eastwards.



Photograph 4: View from Shropshire Way looking northwards.



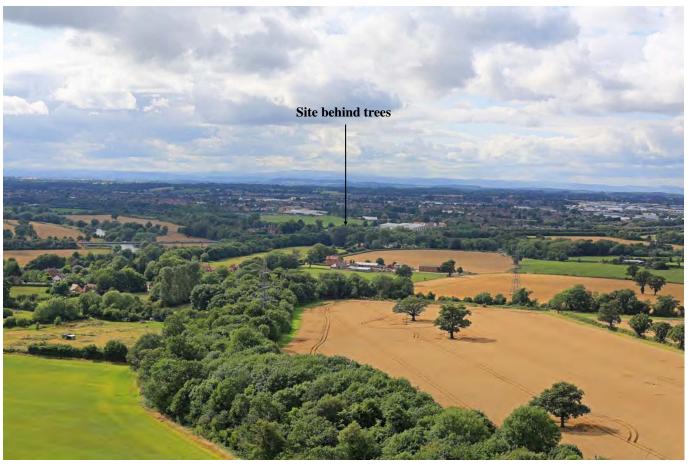
Photograph 6: View from Sundorne Playing Field looking south-eastwards.



Photograph 7: View from junction of Sundorne Rd with A49 looking north-westwards.



Photograph 9: View from Footpath 0443/7 looking north-eastwards.



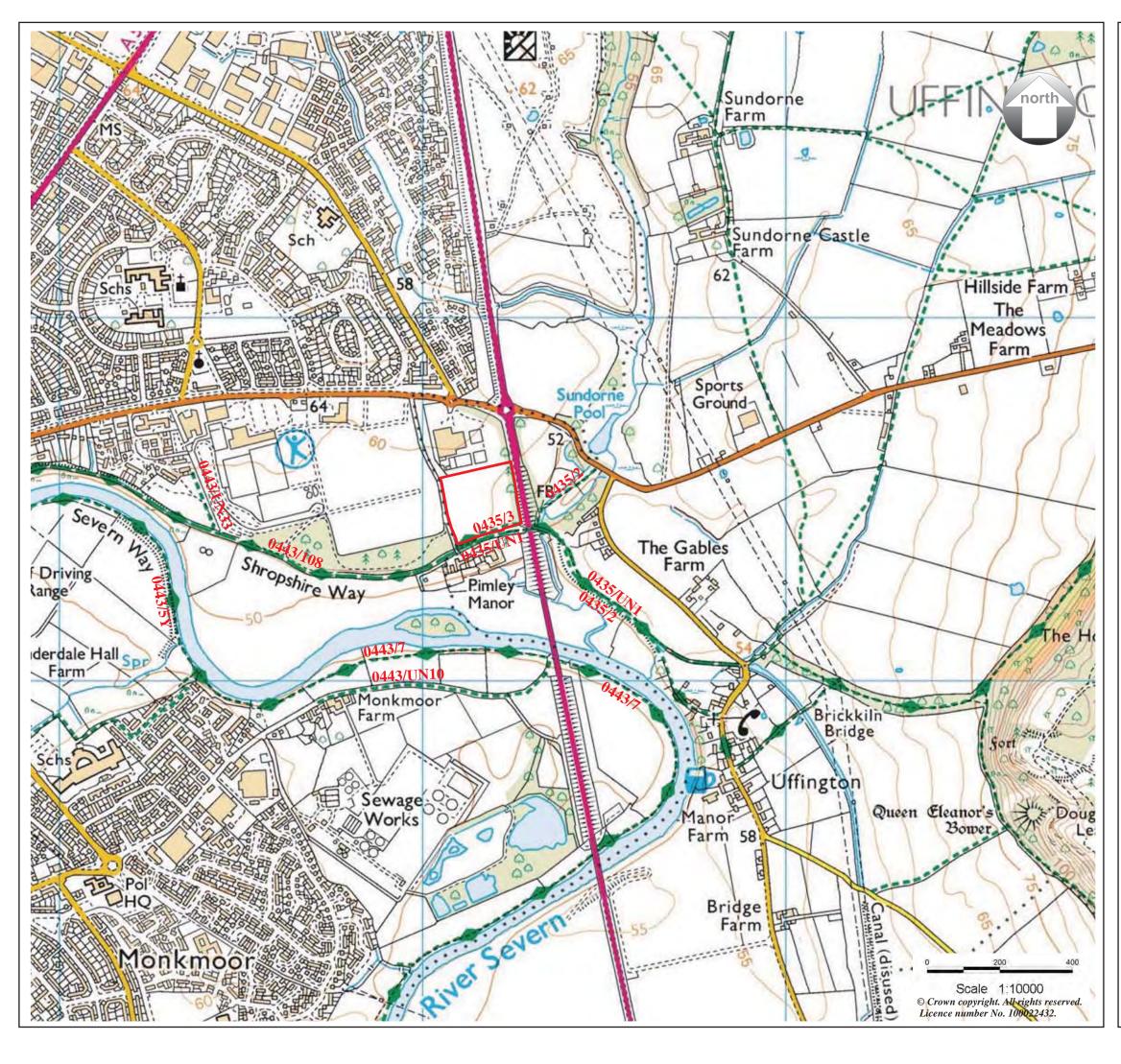
Photograph 8: View from Haughmond Hill looking north-westwards.



Photograph 10: View from Footpath 0443/UN10 looking northwards.

#### **APPENDIX E**

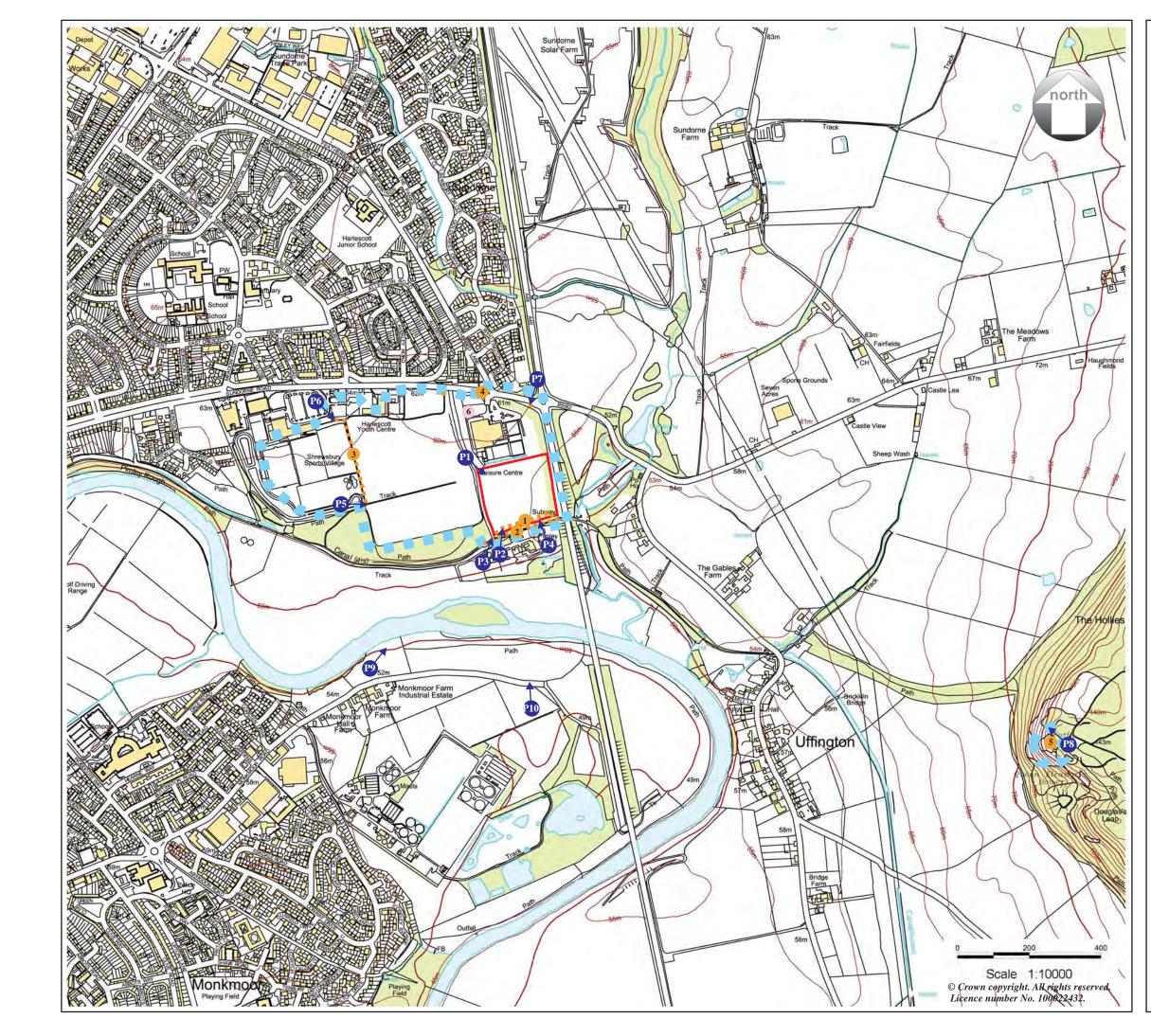
Public Rights of Way



KEY: Site Location
PUBLIC RIGHTS OF WAY
Footpath
Bridleway
+++++ Byway open to all traffic Restricted byway (not for use by mechanically propelled vehicles)
OTHER PUBLIC ACCESS
Other routes with public access
<ul> <li>Recreational route (  alternative route)</li> </ul>
National Trail
J <sup>ob:</sup> Land off Sundorne Road, Shrewsbury
Title: Public Rights of Way
Scale: 1:10,000 Date: Sept 2019
Drawing No: 1530.02 Rev:
ALLAN MOSS ASSOCIATES LTD Environmental Planning and Landscape Design

#### **APPENDIX F**

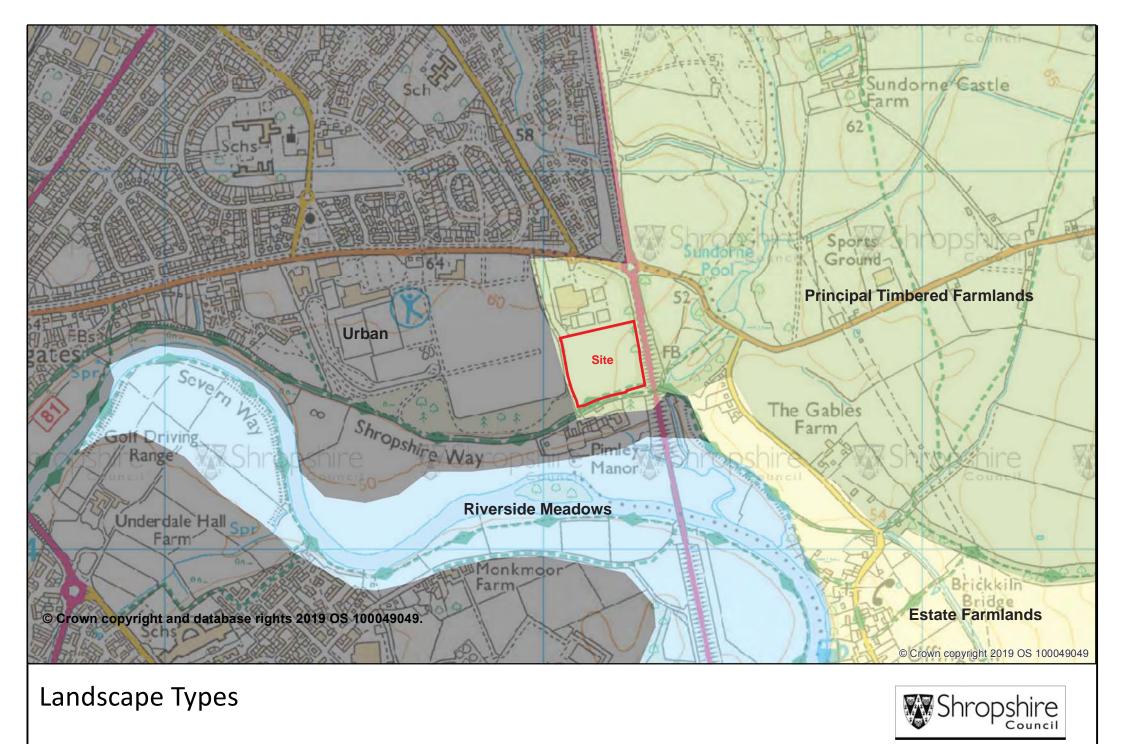
**Visual Receptor Plan** 



KEY:		
	Site Location	
•••	Main Visual Envel	lope
₽)→	Photograph Locat	ions
	Public locations wiviews of site: 1. Footpath 0435/3 2. Shropshire Way 3. Sundorne Playin 4. Sundorne Road 5. Haughmond Hil	ng Fields
	Private dwellings of site: 6. Coracle Close	with potential views
	and off Sundorne prewsbury	e Road,
<sup>Title:</sup> Vi	isual Receptor Pl	an
Scale: 1	:10,000	Date: Sept 2019
Drawing	No: 1530.03	Rev:
		SSOCIATES LTD g and Landscape Design

#### **APPENDIX G**

Extracts from Shropshire Landscape Typology 2006



Date: 19/08/2019

# The Shropshire Landscape Typology



September 2006



# Principal Timbered Farmlands

#### **Key Characteristics**

- Rolling lowland with occasional steep sided hills
- Relic ancient woodland
- Hedged fields with scattered hedgerow trees
- Predominantly dispersed settlement
   pattern



• Small to medium scale landscapes with filtered views

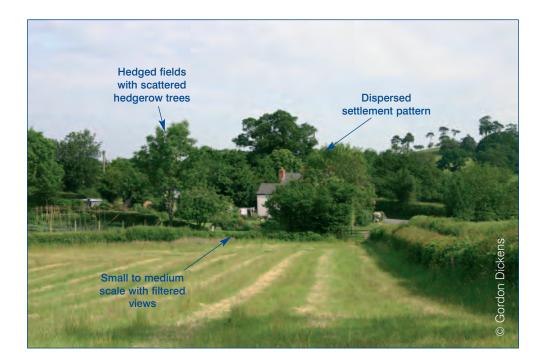
#### Description

This landscape type occurs throughout much of Shropshire, with notable concentrations along the northern boundary with Cheshire, and to the south of Shrewsbury. They are predominantly rolling lowland landscapes, with occasional steeply undulating valley sides, and are characterised by a mosaic of agricultural land.

Tree cover, in the form of dense stands of streamside trees, scattered hedgerow trees, and small to medium sized woodlands play an important role in structuring these landscapes, creating a small to medium scale and filtered views. Much of the woodland has an ancient character, although some woods have been replanted with conifers. Oak and Ash represent the main hedgerow tree species, whilst alder and willow dominate along watercourses.

The settlement pattern typically comprises of a medium to high density dispersal of farms and wayside cottages, with occasional hamlets and small villages.

Like the Wooded Farmlands, much of the agricultural land within this type was gradually enclosed from extensive tracts of woodland and 'waste' (common rough pasture) during the medieval and early modern periods. This has produced an intricate countryside, characterised by a network of



winding lanes, scattered farmsteads, and small irregular fields. Examples include the areas around Buttonbridge, on the edge of the Wyre Forest, and Coptiviney, to the north-west of Ellesmere.

Localised open fields existed around the larger settlement foci, the piecemeal enclosure of which had generally been completed by the 17th century.

In some places, for example around Exfords Green and Longden Common, to the south of Shrewsbury, and Ebrewood to the north-east of the town, sizable areas of common wood pasture and rough grazing land survived into the early modern period. Encroachment by smallholders around the edges of these areas, between the 16th and 19th century, account for the small concentrations of wayside cottages that occur in some places. Enclosure of the remaining area of common land was completed in the 18th and 19th centuries, creating a regular pattern of rectilinear fields and straight roads.

During the later 19th and 20th century, conifer plantations were established in some locations, occasionally on the site of older woodlands. Where more favourable soils exist, the introduction of intensive arable farming in the later 20th century has resulted in field enlargement, creating more open conditions and a larger scale landscape.

#### **APPENDIX H**

Extracts from Shropshire Landscape & Visual Sensitivity Assessment 2018: Study Area Shrewsbury E [01SHR-E]

# **GILLESPIES**

# SHROPSHIRE LANDSCAPE & VISUAL SENSITIVITY ASSESSMENT SHREWSBURY [01SHR]

# SHREWSBURY E [01SHR-E]

#### LOCATION AND CHARACTER

Parcel E is located to the east of Shrewsbury and entirely outside the Shropshire Hills AONB. The character of this parcel is influenced by a succession of urban expansion, with much of the west of the parcel land use consisting of recreational facilities for local residents of Shrewsbury. The east of the parcel retains some rural characteristics and some level of tranquility however loss of hedgerows is noticeable here. The settlement pattern is of clustered development including Uffington. The A49 Shrewsbury bypass bisects the parcel.





1. VIEW EAST FROM SHROPSHIRE WAY & NATIONAL CYCLE ROUTE 81 WITHIN LOCAL WILDLIFE SITE

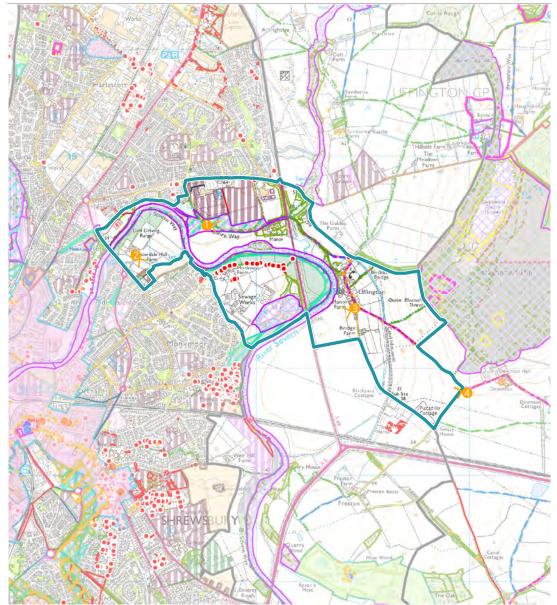


3. VIEW WEST TOWARDS SHREWSBURY SETTLEMENT EDGE AND UFFINGTON VILLAGE

2. VIEW SOUTHEAST OVER ARABLE FARMLAND TOWARDS SHREWSBURY SETTLEMENT EDGE



4. VIEW LOOKING WEST OVER ARABLE FARMLAND FROM EAST OF THE PARCEL



#### LANDSCAPE

#### LANDSCAPE VALUE

This parcel has a strong and positive character and is valued as a green wedge largely surrounded by urban land use. There is a high density of designations to the west of the parcel, including Tree Preservation Orders and Local Wildlife Sites. Human connection to River Severn and associated wildlife sites offers significant recreational value in the west of the parcel. Discrete areas, including pockets around the wastewater treatment works and the urban edge are of lower value, quality and character. Quality in the east is locally diminished due to extensive loss of hedgerow and presence of pylon towers. The landscape makes an important contribution to the enjoyment of the area through use of pedestrian and cycle routes including the Shropshire Way, Severn Way, National Cycle Route 81 and a high level of use outdoor sports grounds, golf and angling areas.

#### LANDSCAPE SUSCEPTIBILITY

Landform in the east comprises west facing slopes from Hangmond Hill down to Uffington. Further west landform becomes gently rolling. Localised areas of steeper topography and flat floodplains are associated with the River Severn that would be vulnerable to change. The scale of the landscape varies from more intimate in the west to large scale in the east. Field systems in the east around Uffington tend to comprise a regular pattern of small scale pastoral fields. Further away from this village there is less regular pattern of larger scale arable fields. The landscape pattern and scale associated with the River Severn is much more intimate and susceptible to change. There is a high level of tree cover to the west. Uffington itself has some character, but loss of hedgerow and tree cover has resulted in fragmentation of landscape elements and reduced perception of tranquillity. Conversely the landscape in the west has a strong sense of place, albeit not rural.

#### VISUAL

#### VISUAL VALUE

A variety of views are experienced throughout this parcel, those which are most highly valued are long ranging or which encompass distinctive Local Wildlife Sites that offer a valuable visual connection to nature in contrast with the urban edges of Shrewsbury. Views are not associated with the Shropshire Hills AONB.

#### VISUAL SUSCEPTIBILITY

VISUAL SENSITIVITY

from employment.

Views from the east are often open and sometimes far reaching from elevated locations, whereas views from the west vary from open, to filtered and framed. There is some intervisibility between parts of this parcel and parcels D and E. Much of the landscape of the parcel does not form part of the skyline, however pylon towers to the east break the skyline in places. Pylon towers in neighbouring parcels are prominent in the view from parts of this parcel. There are a wide variety of visual receptors present and dispersed throughout the parcel with relatively high numbers present to the west. These receptors are associated with the National Cycle Route 81, a network of PRoWs and both the Shropshire Way and the Severn Way regional trails and would be highly susceptible to noticeable changes in the view. There are also views from recreational areas such as allotments (located just outside the parcel), golf driving ranges, sports grounds and angling ponds. The local community of Uffington have generally open views into the parcel and filtered views are afforded from Shrewsbury settlement edge and these receptors would typically be sensitive to changes to their surroundings. There is a high frequency of visual receptors associated with the A49 bypass.

People within the parcel have a variety of views, some of which are highly valued. Pylon

towers within this parcel, and within adjacent parcels D and F, locally detract from views

in the east. The relative numbers of receptors within the parcel is high and varied in

type; this combined with general visibility means views experienced are of medium-high

sensitivity to change arising from new housing and high sensitivity to change arising

#### LANDSCAPE SENSITIVITY

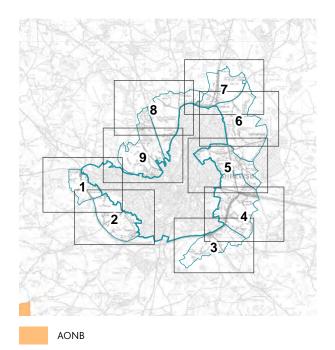
The landscape sensitivity of this parcel is greatly increased due to areas of high recreational value, in particular to the west where the landscape makes an important contribution to the enjoyment of the area. Although the landscape to the east offers less in terms of recreational value, this part of the parcel is valued in terms of its setting to Hangmond Hill. Overall the sensitivity of the landscape to change arising from new housing is high and to employment is very high.

÷												
	LOW	MEDIUM-LOW	MEDIUM	MEDIUM-HIGH	нісн	VERY HIGH	LOW	MEDIUM-LOW	MEDIUM	MEDIUM-HIGH	нісн	VERY HIGH
	LOW	MEDIUM-LOW	MEDIUM	MEDIUM-HIGH	HIGH	VERY HIGH	LOW	MEDIUM-LOW	MEDIUM	MEDIUM-HIGH	нісн	VERY HIGH

# DESIGN GUIDANCE FOR SHREWSBURY

#### [01SHR]

9 SENSITIVITY PARCELS

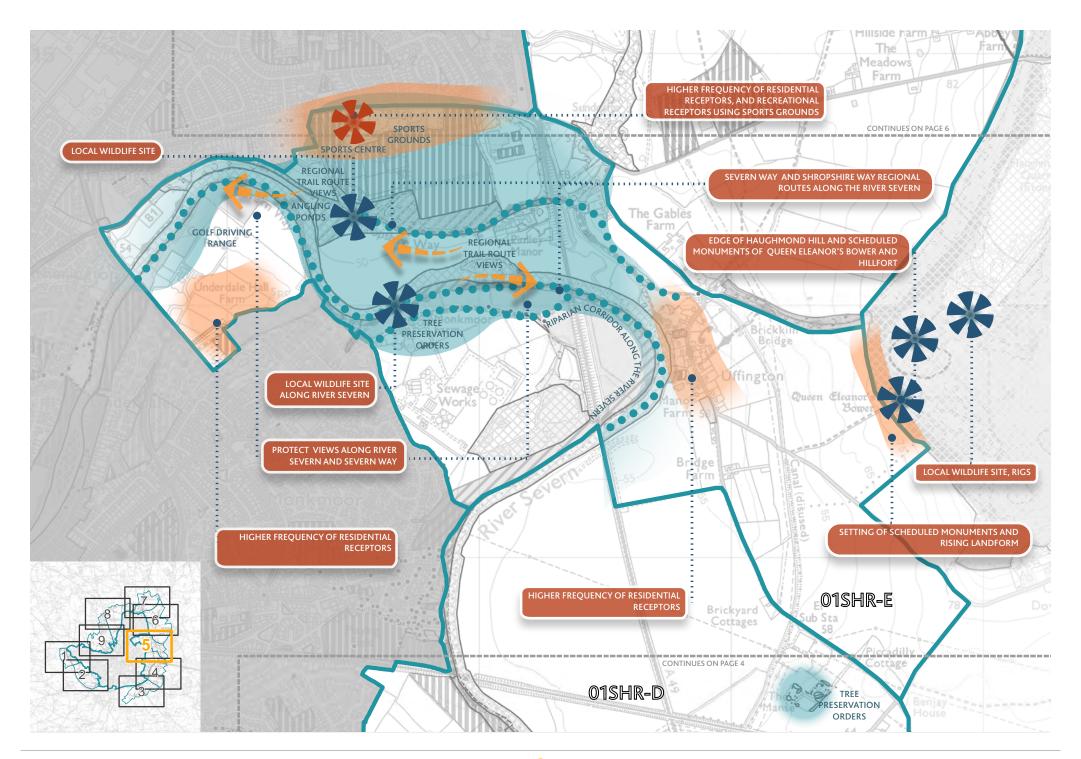


 KEY

 Image: Parcel Boundary

 Image: Parcel Boundary

SHROPSHIRE LANDSCAPE & VISUAL SENSITIVITY ASSESSMENT



#### **APPENDIX I**

Extracts from Shropshire Landscape & Visual Sensitivity Assessment 2018: Assessment Methodology and Summary

# GILLESPIES

# SHROPSHIRE LANDSCAPE & VISUAL SENSITIVITY ASSESSMENT ASSESSMENT METHODOLOGY & SUMMARY

### INTRODUCTION

Shropshire, like other local authorities has to plan for new housing and employment land. To help ensure that such development is directed to the most appropriate locations, Shropshire Council commissioned Gillespies in May 2018 to prepare this landscape and visual sensitivity study to inform the selection of development sites. The conclusions of the study will inform the selection of suitable sites for allocation in the Local Plan<sup>1</sup> Review and provide a sound basis for decision making in the determination of planning applications.

Shropshire offers a diverse range of scenery, from the large lakes and rolling pasturelands around Ellesmere in the north, to the hidden heritage of the Clee Hills with their stark industrial ruins in the south. The landscape forms an integral part of the county's economy, not only because of the farming industries it sustains but also because of the residents, tourists and investors it attracts. The importance of the County's landscape is recognised as being part of the area's special appeal, with the Shropshire Hills formally designated as an Area of Outstanding Natural Beauty (AONB).

Future change needs to be managed in a way that is sympathetic to this landscape and visual character and visual amenity, allowing it to be maintained for future generations to enjoy. In other words, management of landscape change must be sustainably managed. This study provides the evidence-based technical assessment to help ensure that locations identified for new development meet these requirements. Using a systemic assessment framework it examines the sensitivity of the landscape and identifies those areas which can potentially accommodate different thresholds of development without impacting key landscape and visual character and qualities.

A key requirement of the study which differentiates it from others undertaken previously within the county is that it reflects the latest guidance presented in the Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)<sup>2</sup>. This is the industry standard for landscape and visual assessment. The approach advocated in GLVIA3 is based on the commonly adopted premise that development should be more readily accepted in the least sensitive areas and should avoid areas that are highly valued for their scenic, nature conservation, historic, recreational and perceptual qualities such as tranquility and remoteness, particularly those areas safeguarded by international or national designations and those where the cumulative effects of existing and consented schemes limit further development.

In compliance with GLVIA3, the landscape and visual assessments are dealt with separately and each adopts the same step by step approach to combining the judgements about the susceptibility to change arising from the two potential development types with judgements about the value attached to the receptor. This approach allows judgements to be made as transparently as possible. The assessment links back to the key landscape characteristics and valued attribute information provided in the Landscape Types published in the Shropshire Landscape Typology study<sup>6</sup>.

The conclusions of this study when considered alongside the other information being gathered as part of the Strategic Land Availability Assessment (SLAA) will enable Shropshire Council to determine which areas warrant further planning appraisal and ultimately inform spatial development options for the Local Plan and provide a sound basis for decision making in the determination of planning applications. This is consistent with the National Planning Policy Framework (NPPF) which is clear that planning should recognise the 'intrinsic character and beauty of the countryside' and allocate land with the least environmental or amenity value.

This is a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist). More detailed studies relating to specific site allocations and development proposals will be undertaken at a local authority level as part of the Development Plan and development management process.



IMAGE 2. PHOTO LOOKING TOWARDS BREIDDEN HILL, ON THE WELSH BORDER

SHROPSHIRE LANDSCAPE & VISUAL SENSITIVITY ASSESSMENT