



Shropshire Council
Planning Policy & Strategy Team
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21 January 2021

Dear Sirs

Regulation 19 Pre-submission Draft Local Plan

Below are Shrewsbury Town Council's comments in relation to the above consultation.

Shrewsbury Town Council has been actively encouraged to take part in the Local Plan Process and aside from the formal consultations has benefitted from the development of a Local Plan Working Group and Town Council specific meetings to discuss the plan in more detail.

This has allowed us to:

- Understand the local plan process and the need for a sound strategy for the county as a whole and also the county's role in the bigger West Midlands growth agenda and how Shropshire Council has undertaken its duty to co-operate in that wider decision making;
- Influence Shrewsbury's role in that plan including recommending levels of growth, direction of and priorities for growth and inclusion of sometimes Shrewsbury specific key policies;
- Provide local knowledge of proposed allocations and potential impact on the current town infrastructure;
- Press how this county plan needs to embed the vision of the Shrewsbury Big Town Plan and take forward some of those key defining principles

Throughout Shropshire Council Officers have:

- Kept us aware of timeframes and notified of any necessary changes and the rationale for doing so;
- Allowed meaningful consultation and have considered the responses we have made and amended the plan to reflect some of those representations;
- Responded to those local issues;
- Ensured that this plan is one of a number of Strategy documents that will shape the future growth and aspirations for Shrewsbury and Shropshire.

We have had the opportunity to comment on the following documents:

- Issues and Strategic Options (January 2017);
- Preferred Scale and Distribution of Growth (November 2017);
- Preferred Site Allocations (November 2018);
- Strategic Sites (June 2019);
- Draft Pre-Submission Local Plan (August 2020)

In generally being supportive of the legality and robustness of the plan Members would like to raise the following comments:

- There was concern about the level of robustness in which planners are influencing the development plan process with a number of sections within the document referring to the authority's encouragement of developer direction rather than prescribing direction. This, members fear, could in turn lead to the delivery of inadequate infrastructure and poor ambition on energy delivery and biodiversity. The Town Council has previously made references to other local plans elsewhere where more ambitious targets have been set
- Members continue to worry about the loss of the greenfield land as development is being driven to the edge of the town's development boundary; as we have raised previously this causes huge geographical issues as the town begins to expand not just out of its development boundary but also its parish boundary. Members acknowledge a change in shift in the current Big Town Plan draft where the potential use of underused and empty sites are being recommended with a more intensive mix of use.
- Some of our members have questioned the sustainability of the North West Relief Road and the rationale in the development of large infrastructure projects like this following the predict and provide method rather than the reduce and shift method. Having said that some have provided the counter argument that NWRR would bring huge economic advantages to Shrewsbury and

was key to enabling active travel. This will be a matter we shall look to revisit at the time the NWRR application is submitted.

- Members continue to raise references to the Big Town Plan Shrewsbury and why this has been evolved into the Shropshire Test and whilst it goes some way to prescribing a range of design principle we fear that the sentiments of the Shrewsbury Test as defined in the Big Town Plan are watered down. Members see the virtue of having good design policies; the more robust the design policies the better the delivery on design. This is something that members may wish to explore further with the Big Town Plan process.
- Members have made reference to the Shrewsbury Place Plan and emphasis within on active travel. In an era when walking, cycling and public transport is dominating discussion particularly in light of the pandemic, members wished to be assured that the Local Plan does not advocate a Car is King. Members feel there is a need for a Cycling & Walking Infrastructure Strategy, creating both new infrastructure but creating the necessary investment to maintain the existing transport infrastructure to ensure smooth linkages. Additionally, members feel there is a need for integrated travel arrangements linking multiple modes of travel together. Members would welcome involvement in the development of such proposals.
- There is reference in the Local Plan to a Green Infrastructure Strategy but members are unaware of its existence. Whilst members are appreciative of the efforts in establishing Development Management Policies on Green Infrastructure and Landscaping it is essential that local and countywide aspirations are set out in detail.

Members have noted that the employment development site at Battlefield Roundabout has been removed in this draft plan and have no objections to its removal.

Whilst it is recognised that some of the points raised above are out of the remit of the Regulation 19 consultation, we would hope that the Town Councils commentary is noted and Officers are able to direct such commentary to appropriate project development streams and seek the Town Council's contributions particularly around the following:

- Delivery Master-planning for the Shrewsbury Big Town Plan Masterplan;
- Any future discussions on the Shropshire Test and/or Shrewsbury Test including the establishment of a Design Panel;
- Development of Active Travel Plans;
- Development of a Green Infrastructure Plan;
- Engagement on the Shrewsbury Integrated Transport Plan 4;
- Commentary on the NWRR Planning Application;

- Early engagement with developers early in the development plan process and in particular the development of any land allocation Masterplans

Members recognised the need to maintain a robust local plan that ensures the right development and in raising no objections to the legality and robustness of the plans, we hope that our comments are recognised and taken note of in the wider planning and strategy development.

Yours sincerely

Helen Ball BA (Hons) FSLCC
Town Clerk