



Eddie West
Local Plan Team Leader
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

By email only:
Planningpolicy@Shropshire.gov.uk

Our Ref: SA33199/ST/ML
Date: 1st February 2021

Dear Eddie,

Shropshire Local Plan – Regulation 19 consultation

Our client, Mattell Trustees, have the following comments on the emerging Shropshire Local Plan. For your ease of use these are also replicated on the attached forms:

Part A: Consultees' details

Part B: representations on:

- Policy: Strategic Policy SP2 'Strategic Approach'
- Policy: Settlement Policy S18.1 - 'Development Strategy: Whitchurch Principal Centre'
- Policy Map: Inset S18 – 'Whitchurch'

- **Strategic Policy SP2 'Strategic Approach'**

This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported.

The identification of Whitchurch as a Principal Centre accords with the Local Plan's vision in this regard, given Whitchurch's size, range of services, facilities and employment opportunities and its strategic location on the A49 corridor, with excellent connections to other English regions to the north.

- **Settlement Policy S18.1 - 'Development Strategy: Whitchurch Principal Centre'; and**
- **Inset S18 – 'Whitchurch'**

The designation of Whitchurch as a Principal Centre settlement in Policy S18.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. Whitchurch is a sizeable settlement of over 10,000 residents. It has a very good range of services and facilities, scoring 110 points in the Council's 'Hierarchy of Settlements' Paper (August 2020) and ranking 2nd of the Plan's 5 Principal Centres.

In addition, the explanatory text to policy S18.1 that the settlement plays an important role in Shropshire. In this regard, Paragraph 3.142(d) and (e) specifically identify Whitchurch as a Principal Centre on Strategic Corridors and Policy SP14: Strategic Corridors states that the “Shropshire Economic Growth Strategy seeks to deliver a ‘step change’ in the capacity and productivity of the local economy. To contribute to this aim, ‘Strategic Corridors’ along the principal rail and strategic road routes through the County will be the primary focus for major development especially along ‘strategic corridors’ with both rail and road connectivity”.

It is evident, therefore, that Whitchurch should be a significant centre for growth in Shropshire, both socially and economically.

Despite the town's good sustainability credentials, the submission Local Plan places a significant reliance on windfall development to meet the needs of the town over the Plan period, with an additional 82 dwellings as windfall (unplanned development). Given the strategic importance of growth being directed to Whitchurch such a reliance on windfall development is considered inappropriate.

The Council's Landscape & Visual Sensitivity Assessment (LVSS) identified the southern area, along the route of the A525, as having the lowest landscape sensitivity for housing development as shown in figure 1 below.

WHITCHURCH LANDSCAPE SENSITIVITY

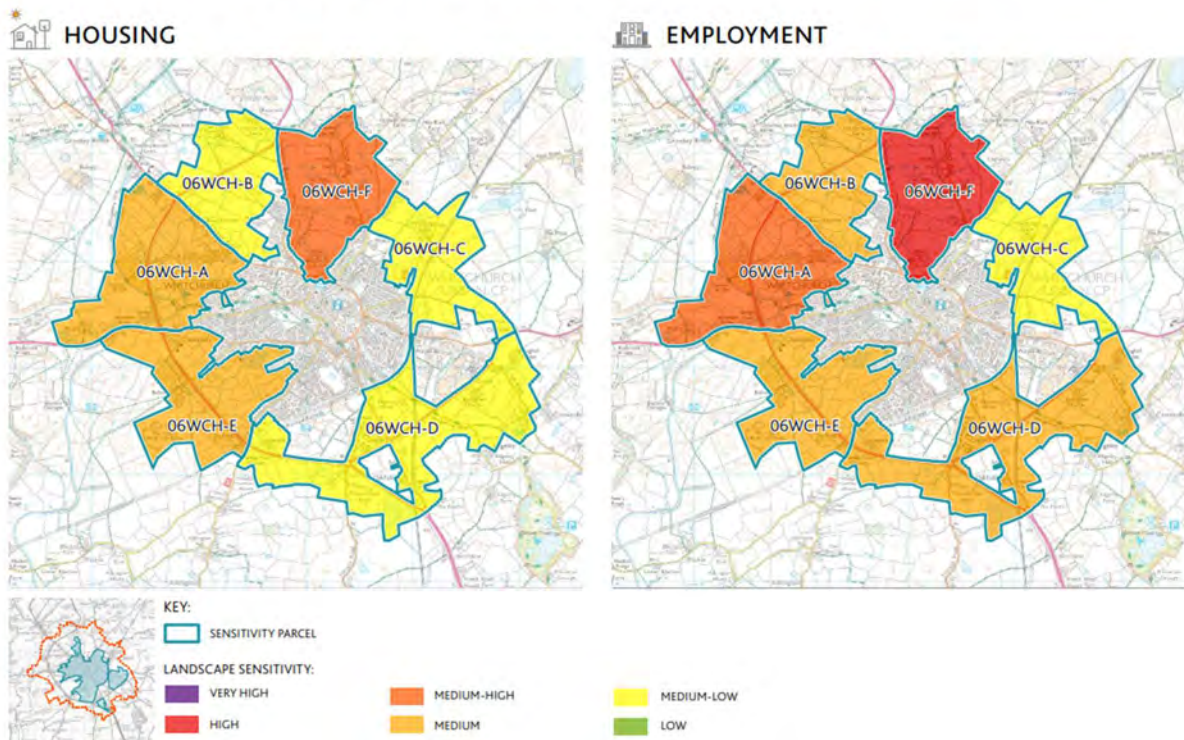


Figure 1: Extract from page 16 of the Whitchurch LVSS

Similarly, the LVSS identified the southern area, along the route of the A525, as having the lowest visual sensitivity for housing development as shown in figure 2 below.

WHITCHURCH VISUAL SENSITIVITY

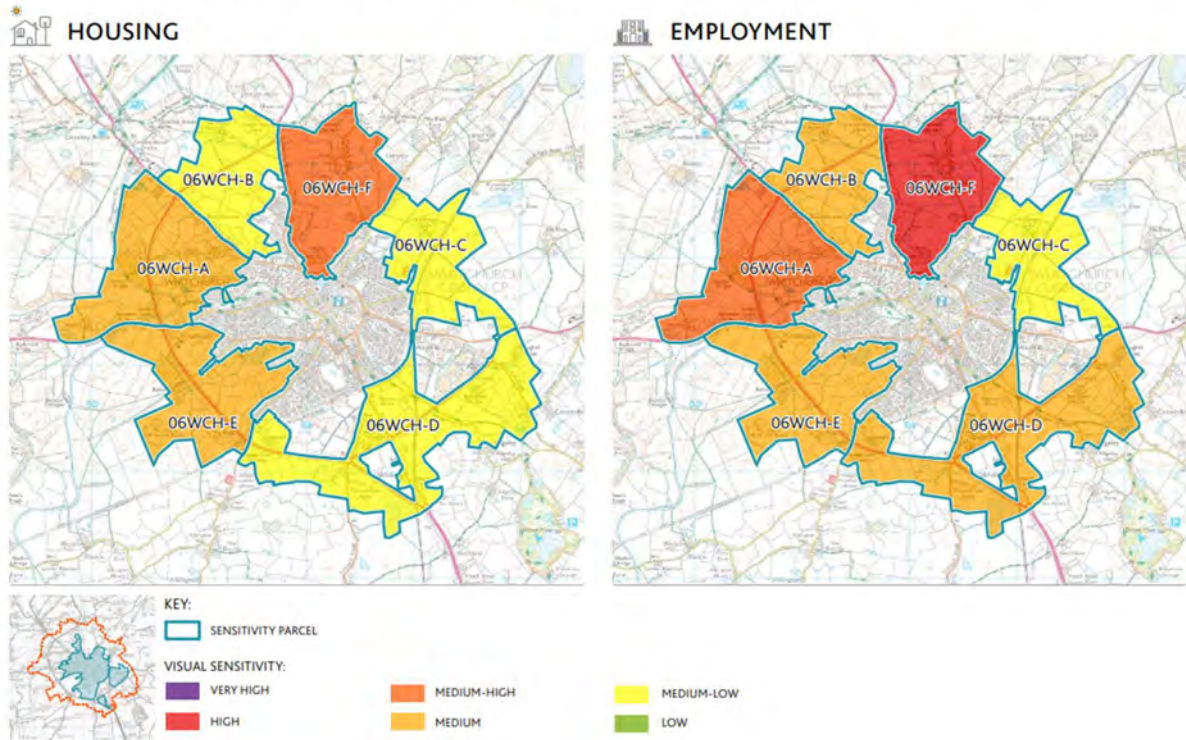


Figure 2: Extract from page 17 of the Whitchurch LVSS

The LVSS therefore concludes that the southern area of the town, along the A525 corridor (Parcel 06WCH-D) is “less susceptible to change, as alterations to ground levels, new hedgerow and tree planting, could be accommodated to integrate new development into the landscape” and an area where “the potential to accommodate new development within the parcel with appropriate mitigation, combined with the extensive road network, means views experienced are of medium-low sensitivity to change arising from new housing” (LVSS page 11).

This area is therefore an appropriate location for additional housing development to meet Whitchurch's housing needs.

The Council's Site Assessments for Whitchurch appraised 50 sites with resulting Sustainability Appraisal scores ranging from 6 to -13, as reported on pages 12-16 of the Whitchurch Place Plan Area Site Assessments. 19 sites were rated 'poor' (scores -8 to -13), 22 sites were rated 'fair' (scores -1 to -7) and 9 sites were rated 'good' (scores 6 to 0).

One of the sites rated 'Good', which also falls within parcel 06WCH-D of the LVSS, is site WHT002. This site scored 1, the third highest score, in the sites assessments. The site is outlined in red on the location plan below (figure 3).

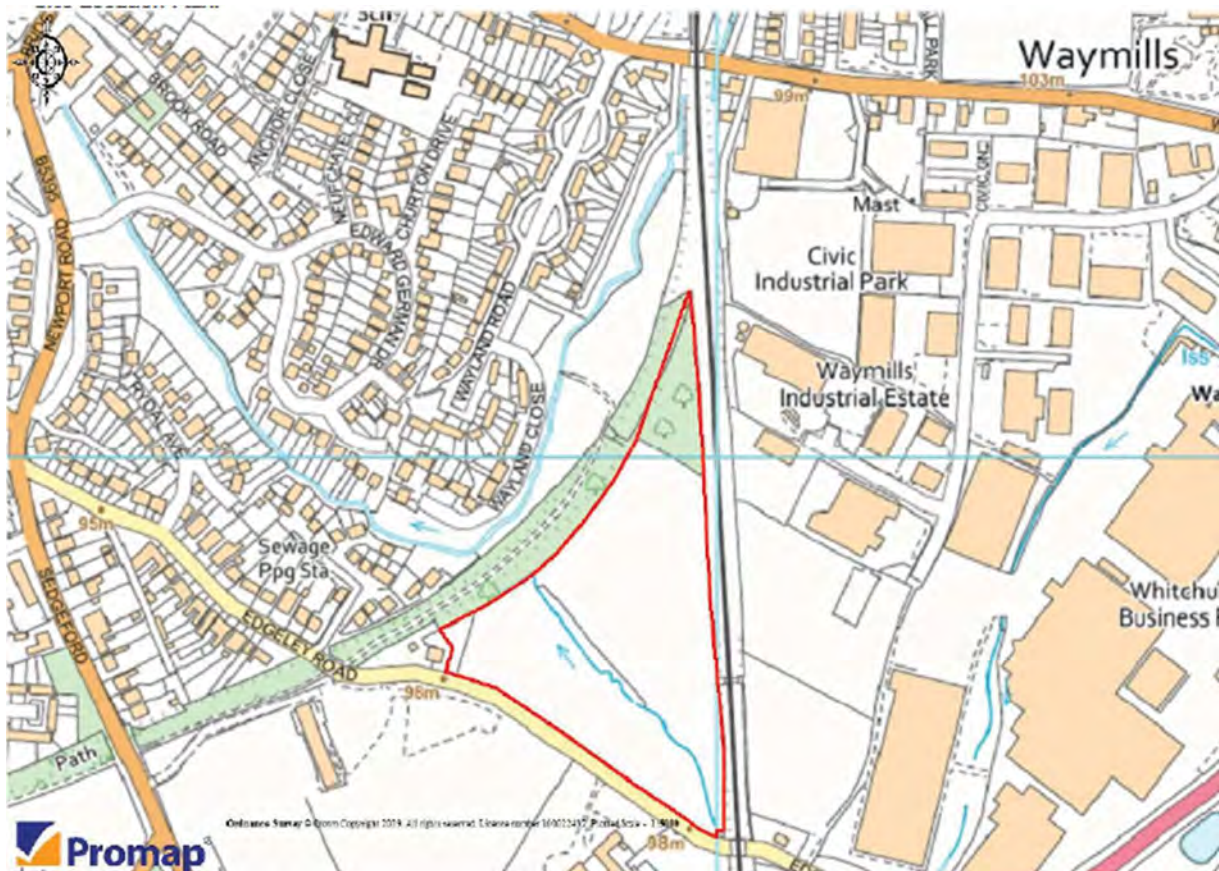


Figure 3: Location of site WHT002 (outlined in red)

Nonetheless, whilst site WHT002 scored highly in the Stage 2a Sustainability Appraisal, and that residential development on the site was considered to be achievable and viable in the Stage 2b Screening, the site was removed from the assessment process due to concerns that the amount of land that would be required for retention and buffering of the ecological features would leave very little land available for development.

However, a recent planning application (now withdrawn) for residential development was submitted on the site (application ref. 19/05311/OUT). This application addressed the concerns raised over the amount of land that would be required for retention and



buffering of the ecological features, as demonstrated by the response of the Shropshire Wildlife Trust to the application who conclude that, subject to the recommendations of the Ecological Assessment submitted with the application being implemented, they have no objections to the proposed development of the site.

Our client's land therefore represents a unique and highly sustainable opportunity to deliver residential development in the town on land that is enclosed by the existing built form of the settlement and will not, therefore, encroach into open countryside but will assimilate into the settlement with ease, ensuring that the character and appearance of the area is preserved.

Conclusion

For the reasons set out above, including the strategic importance of growth being directed to Whitchurch, the over reliance on windfall development in the settlement and the opportunity to direct some of this growth to unconstrained, available and deliverable sites in sustainable locations within the town, means Policy S18.1 fails the 'positively prepared', 'justified' and 'effective' tests of soundness.

Q5 Modifications necessary to make the Plan sound

To make the Plan 'sound' requires the allocation of additional land in Whitchurch to deliver housing.

Policy S18.1 and the Whitchurch Policies Map should therefore be amended to include our client's land (site reference WHT002), within the development boundary of the settlement and allocated for residential development for up to 50 dwellings.

The allocation of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.

- **Next Stages**

I trust you will take these representations into account. If you have any queries whatsoever, please don't hesitate to contact me to discuss.

Yours sincerely,

Stuart Thomas BA(Hons) MA MRTPI
Head of Planning
For and on behalf of Berrys
DDI: 01743 267069
stuart.thomas@berrys.uk.com

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:	Stuart Thomas (BERRYS) on behalf of MATTELL TRUSTEES
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire 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: Policy: Site: Policies Map:

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 Yes: No:

(Please tick as appropriate).

Q4. 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.

See Text Overleaf.

(Please continue on a separate sheet if necessary)

Q4. Why the Plan is unsound

The designation of Whitchurch as a Principal Centre settlement in Policy S18.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. Whitchurch is a sizeable settlement of over 10,000 residents. It has a very good range of services and facilities, scoring 110 points in the Council's 'Hierarchy of Settlements' Paper (August 2020) and ranking 2nd of the Plan's 5 Principal Centres.

In addition, the explanatory text to policy S18.1 that the settlement plays an important role in Shropshire. In this regard, Paragraph 3.142(d) and (e) specifically identify Whitchurch as a Principal Centre on Strategic Corridors and Policy SP14: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity".

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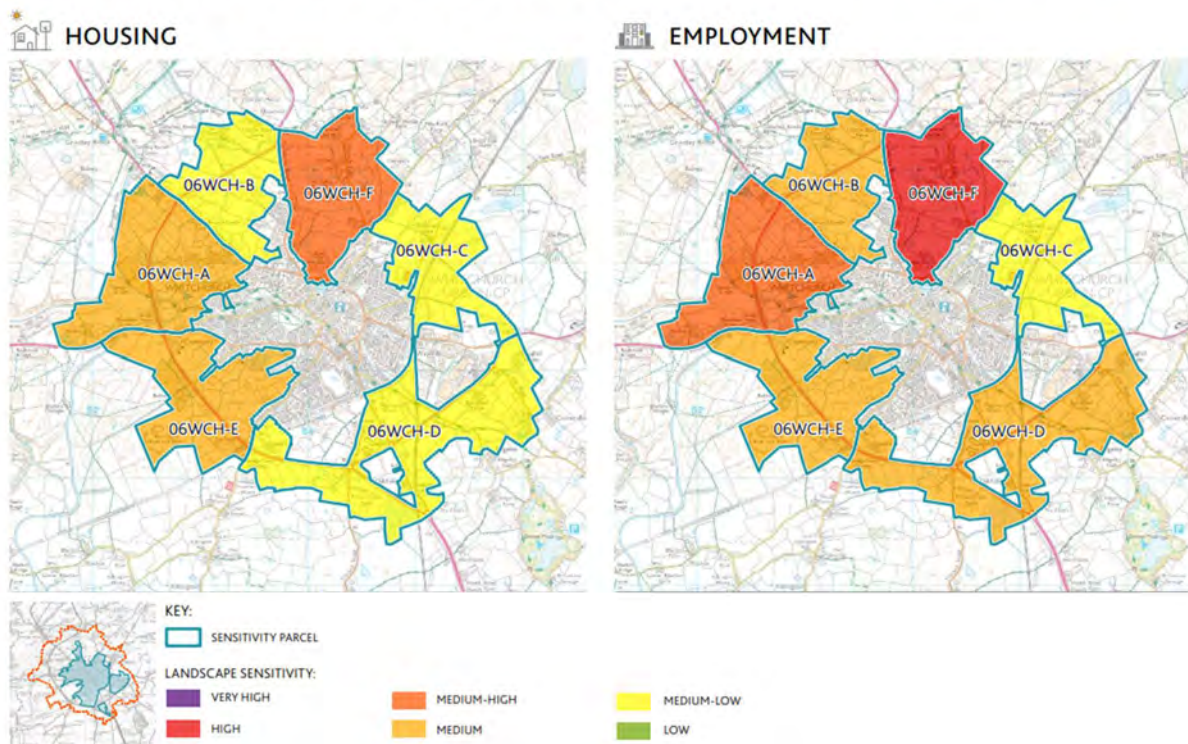


Figure 1: Extract from page 16 of the Whitchurch LVSS

Similarly, the LVSS identified the southern area, along the route of the A525, as having the lowest visual sensitivity for housing development as shown in figure 2 below.

WHITCHURCH VISUAL SENSITIVITY

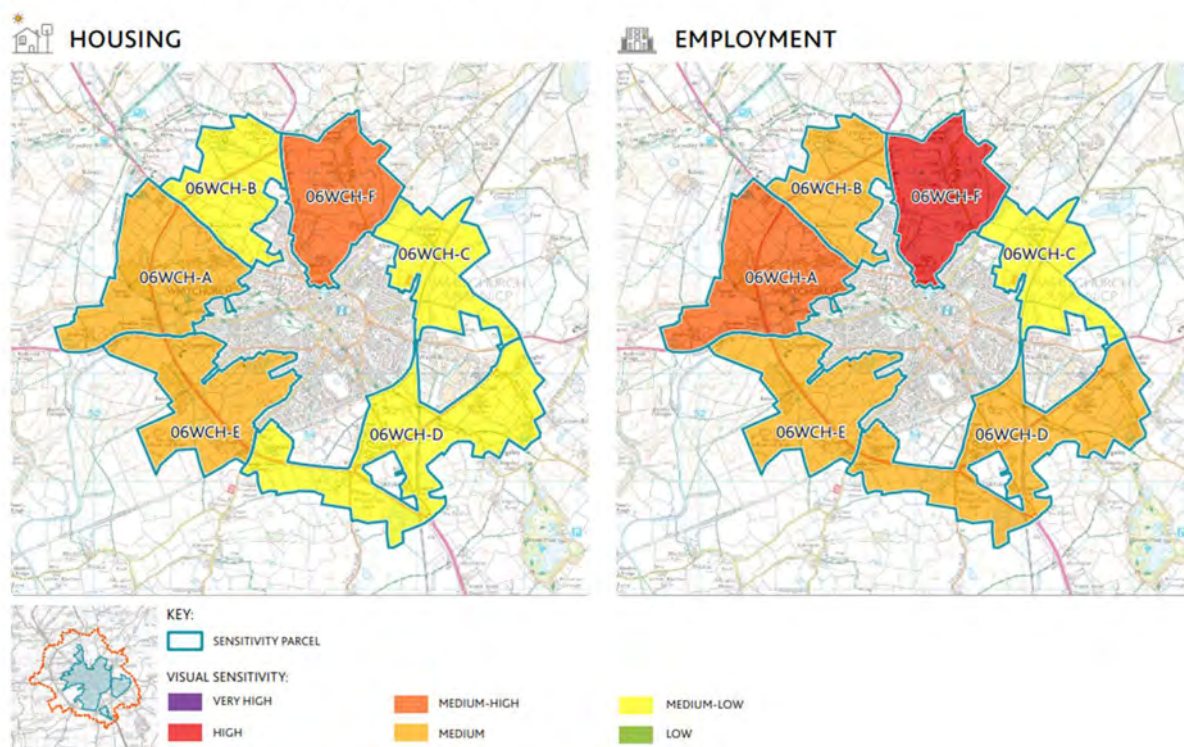


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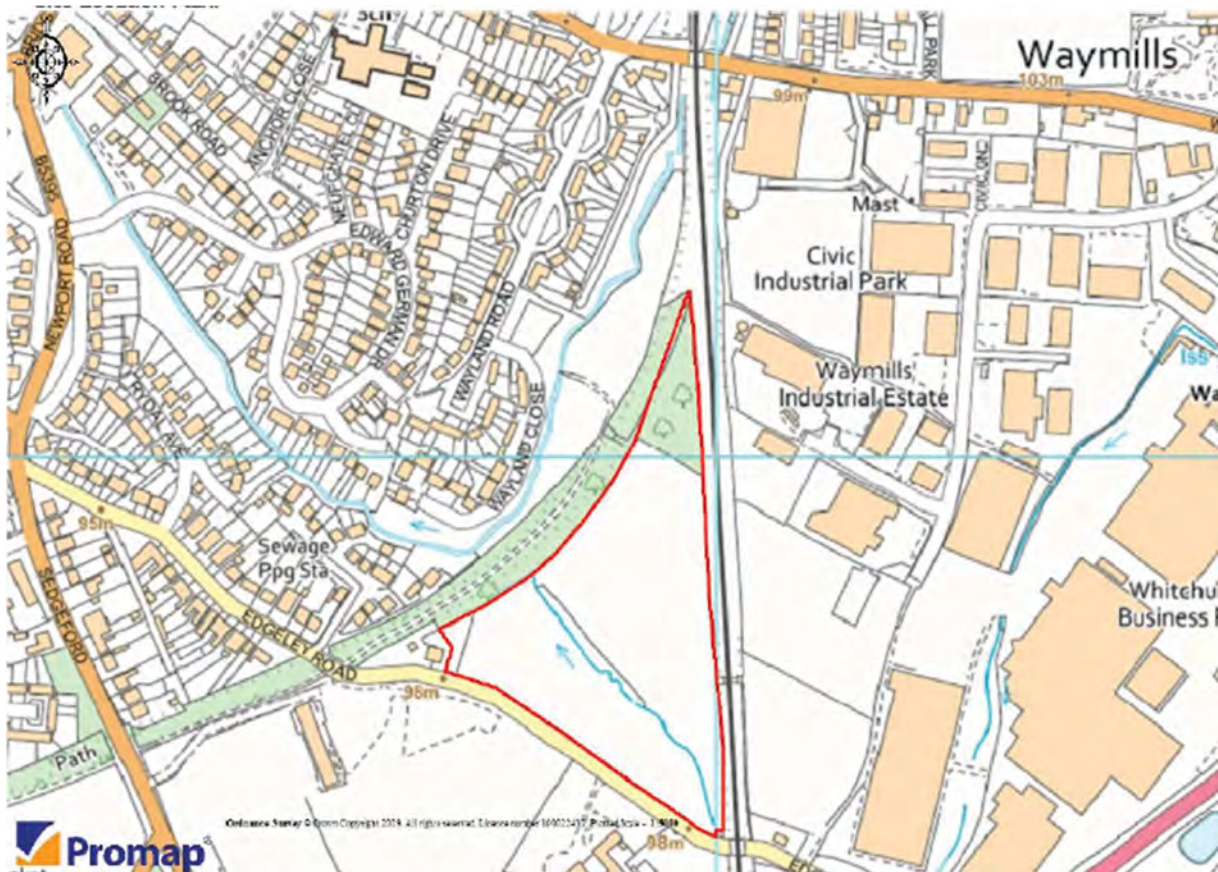


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Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 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.

Please see above.

(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:

In order to participate in, and therefore assist in ensuring, comprehensive consideration of the appropriateness of the planned level and distribution of residential growth in Whitchurch during the Plan period.

(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: S. Thomas

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Strategic Policy SP2 'Strategic Approach'

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