



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

By email only:
Planningpolicy@Shropshire.gov.uk

Our Ref: SA35125/ST/ML
Date: 26th February 2021

Dear Eddie,

Draft Shropshire Local Plan – Regulation 19 consultation

Our client, Commercial Estates Group (CEG), has the following comments on the emerging draft 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 SP2 – Strategic Approach
- Policy: Settlement Policy S16.1 'Development Strategy: Shrewsbury Strategic Centre'
- Policy: Settlement Policy S16.1(i) 'Residential and Mixed-Use Allocations: Shrewsbury Strategic Centre'
- Policy Map: Inset S16(b) Shrewsbury Town
- Site: Local Plan Mixed Allocation SHR060, SHR158 & SHR161

Policy SP2 – Strategic Approach

Policy SP2 sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum.

We would support this policy which represents an appropriate level of growth and is consistent with the annual housing requirement and standard methodology. We would also support the defined role of Shrewsbury in this policy as a Strategic Centre. Shrewsbury should continue to be the focus of new housing development.

Settlement Policy S16.1 ‘Development Strategy: Shrewsbury Strategic Centre’

This policy is supported as it recognises the strategic role of Shrewsbury in the County and directs a significant proportion of the County’s housing and employment land growth to Shrewsbury during the Plan period.

In addition, the identification of land to the west of the town (namely the Mixed Allocation SHR060, SHR158 & SHR161) as a focus for growth during the plan period is also supported as this land is unconstrained and lies in a highly sustainable location. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.

Settlement Policy S16.1(i) ‘Residential and Mixed-Use Allocations: Shrewsbury Strategic Centre’; Policy Map Inset S16(b) Shrewsbury Town; and Local Plan Mixed Allocation SHR060, SHR158 & SHR161

Strategic Policy S16.1(i) ‘Residential and Mixed-Use Allocations: Shrewsbury Strategic Centre’, Policy Map Inset S16(b) Shrewsbury Town and Mixed Allocation ‘Land between Mytton Oak Road and Hanwood Road, Shrewsbury SHR060, SHR158 & SHR161’ are supported.

The site is a strategic allocation and will make a significant contribution towards the overall housing and employment requirements for Shrewsbury up to 2038 and beyond, into the next Plan period.

The majority of the site allocation (SHR158) is controlled and promoted for development by CEG, who is a strategic land promoter, development and investment company operating across the UK.

CEG has extensive experience of and a proven track record in delivering a huge range of development projects, from office and residential, to retail, industrial and mixed-use including major sustainable urban extensions. In delivering on projects CEG works closely, and builds lasting relationships, with local authorities, landowners, stakeholders and communities. CEG therefore has a proven track record in delivering development projects and this is exemplified in Shrewsbury with CEG’s involvement in the development at Bowbrook to the north-east of, and adjoining, proposed mixed use allocation SHR158/SHR060/SHR161.

Development Guidelines

In respect of the development guidelines at page 272-273, we have the following comments:

- **Housing** – The overall housing quantum for the site (1,500 dwellings) in the plan is supported.
- **Employment Land** – The quantum of employment land is supported however we would request that this is expressed as 5 hectares. Accordingly, the word *minimum* should be removed from the development guidelines to avoid this quantum being open-ended and to provide certainty for the masterplanning process and the subsequent development and delivery of the site.

BERRYS

- **Local Centre** – The principle of providing a centre including neighbourhood shopping facilities, leisure and community uses on the site is supported however the precise size, composition and location of the centre will be given careful consideration as part of the ,masterplanning and planning application process at the appropriate time. Furthermore, we consider that the centre should be described as a ‘Neighbourhood Centre’ to better reflect the scale and function of the proposed Mixed Allocation.
- **Education and Health Facilities** – We support the principle of providing safeguarded land for new educational and health facilities however careful consideration will need to be given to the precise quantum, configuration, and location of the land in conjunction with the Local Education Authority and Clinical Commissioning Group respectively at the appropriate time to inform the masterplanning process. Any references to specific land areas in the development guidelines need to be fully evidence-based.
- **Site Design & Layout** – We recognise that a masterplan will need to be prepared for the site at the appropriate time and the quality, design, mix and layout of the development will be informed by site constraints and opportunities.
- **Highways and Access** – We support the general approach taken to vehicular access points, pedestrian, and cycle links within and through the site. Further careful consideration will be given to this through the masterplanning process. However, we would express some concern that “all necessary improvements to the Local and Strategic Road Networks will be funded through the development”. This is imprecise and open ended and would request the Council consider an alternative form of words which ensures that any mitigation that is necessary to accommodate any unacceptable impacts of the development on the highway network will be provided or funded by the developer.

We note the suggested provision of a Park and Ride facility on land owned and controlled by the Council (SHR161) and recognise the desire to ensure integration with and linkages from the Park and Ride to the wider development.

- **Green and Blue Infrastructure** – We support the approach taken to green and blue infrastructure. A sustainable drainage strategy and Green Infrastructure network will be key components of the masterplan.

In summary, the allocation of this site is supported as it represents a significant, and unique, opportunity to meet the social, environmental, and economic needs of Shrewsbury during the current Plan period and beyond. It is considered essential that the Plan enables flexibility on the precise amount and mix of uses to be provided on the site to ensure that the site best meets the development growth requirements of the town.

Masterplan

CEG is positively collaborating with the two other landowners who control land in the draft allocation; Mr Roger Parry on behalf of Davies Parry (Oakfields) Limited (Site SHR060) and Shropshire Council via their Estates Team (Site SHR161). Through this joint working arrangement, a draft Masterplan is being prepared that aims to provide a comprehensive approach to the creation of a cohesive and coordinated high quality development in accordance with adopted and emerging planning policy.



The development guidelines as drafted state that *“a decision on a planning application will not be made until such time as a Masterplan for the site has been approved by Shropshire Council”*. We would request that the Council consider an alternative form of wording which provides greater clarity on the process by which the Council intends approve a masterplan in order to avoid not unduly delaying the submission and determination of a planning application.

CEG has worked collaboratively with the adjacent landowners on a Concept Framework Plan to inform the emerging masterplan and the latest version of this is attached in **Appendix I**.

CEG would like to take this opportunity to reaffirm its commitment to working proactively and positively with the Council, all landowners, the local community, and other stakeholders to progress the masterplan and subsequently deliver a mixed-use scheme that meets the needs of the settlement.

Viability and Deliverability

CEG is an experienced national strategic land promoter with a proven track record of delivering major sustainable urban extensions. There are no abnormal costs or technical constraints that would render the development of the site unviable or undeliverable.

If necessary, CEG will submit its own detailed site-specific viability assessment in support of the draft allocation at the appropriate time, however we continue to question some of the broadbrush assumptions and conclusions reached in the Council’s current evidence base on viability. CEG would once again welcome further engagement with the Council on this.

In respect of deliverability, CEG is fully committed to preparing a masterplan, submitting a planning application and bringing forward the site for development as soon as possible. Some early discussions with housebuilders have taken place to date, and it is expected that a significant proportion of the site will be brought forward early in the plan period.

Conclusion

To conclude we support the Council’s allocation of this strategic site in the draft Local Plan and look forward to continued discussions. However, should you have any queries whatsoever, please do not hesitate to contact me.

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:	Mr Stuart Thomas (BERRYS) on behalf of CEG
------------------------	--

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:	<input type="text"/>	Policy:	<input type="text" value="S16.1"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (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.

This policy is supported as it recognises the strategic role of Shrewsbury in the County and directs a significant proportion of the County's housing and employment land growth to Shrewsbury during the Plan period.

In addition, the identification of land to the west of the town (namely the Mixed Allocation SHR060, SHR158 & SHR161) as a focus for growth during the plan period is also supported as this land is unconstrained and lies in a highly sustainable location. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.

(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.

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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)?

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- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

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Signature: Mr S. Thomas Date: 01/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S16.1(i)"/>	Site:	<input type="text" value="SHR060, SHR158 & SHR161"/>	Policies Map:	<input type="text" value="S16(b)"/>
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Part A Reference:

Part B Reference:

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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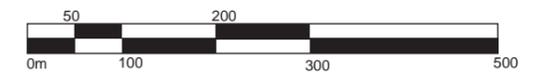
Office Use Only	Part A Reference:
	Part B Reference:



* Potential education expansion areas

Land Budget and Dwelling Capacity

	Total Area (Ha)	Employment / Community (Ha)	Residential (Ha)	DPH	Units
SHR158	75.50	4.50	31.94	35	1118
SHR060	20.09	0.50	12.53	35	439
SHR161	8.06	0.50			
TOTAL	103.65	5.50	44.47	35	1556



J	Rev
DE_283_02	Drg No
CEG	Client
Shrewsbury	Project
Concept Framework Plan	Title
1:7500@A3	Scale