



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:	AM Ventures 1
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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" value="Various"/>	Policy:	<input type="text" value="Various"/>	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 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.

Please refer to attached letter

(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.

Please refer to attached letter

(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:

(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.*

Office Use Only	Part A Reference:
	Part B Reference:

Our Ref: PG/04B813040
Your Ref: Regulation 19 Consultation



24 February 2021

Planning Policy
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

By email to: planningpolicy@shropshire.gov.uk

Dear Sir/Madam,

**Regulation 19 Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 –
Representations on behalf of AM Ventures 1**

On behalf of our client, AM Ventures 1, we are writing to provide our comments on the Regulation 19 Pre-Submission Draft version of the Shropshire Local Plan 2016 to 2038, which was recently published for a period of public consultation.

AM Ventures 1 are owners of the former Travis Perkins (building merchants) site off Wood Street in Shrewsbury, SY1 2PN, which is considered to represent an excellent opportunity to bring forward a high quality, sustainable new residential development. The comments below are provided in this context.

Background to the former Travis Perkins site

AM Ventures 1 are promoting a proposal for residential development comprising approximately 70 - 80 units on the former Travis Perkins site.

A formal pre-application request has been progressed with the Local Planning Authority under reference PREAPP/20/00364 which has enabled AM Ventures 1 to formally open dialogue and start working with Planning Officers to assess the site's key opportunities and constraints, and to co-develop an appropriate development scheme.

Positive discussions have also been held and are ongoing with Council Officers responsible for the Shrewsbury Big Town Plan regarding the proposed redevelopment of the Wood Street site for residential use and the wider opportunities this could create, such as facilitating wider footpath and cycleway links to and from the town centre.

The site is located within Flood Zone 3 and AM Ventures 1 recognise that addressing flood risk issues will be critical to the success of any development proposal for housing. To this end, AM Ventures 1 and their technical advisers have committed significant time and investment to find an innovative flood mitigation solution to the site, which would potentially also benefit a significant

amount of surrounding homes. Detailed discussions with the Environment Agency have supported residential development in principle and AM Ventures 1 are seeking to discuss this matter further with Council Officers as part of the pre-application follow up process.

Within the pre-application advice letter issued to AM Ventures 1 in November 2020, the Local Planning Authority stated that residential development was an acceptable use on the site in principle, subject to addressing technical considerations, in particular flood risk.

Draft Policy SP1. The Shropshire Test

Draft Policy SP1 is aimed at providing a clear indication to future applicants of the high standards that the Council will seek to apply in managing development.

The former Travis Perkins site provides an opportunity to accommodate a residential development of a high standard of design, which would contribute towards the creation of a sustainable community in the local area, address flood risk issues on the site and beyond and enhance pedestrian and cycle linkages with Shrewsbury town centre, in accordance with the objectives of this emerging policy.

Draft Policy SP2. Strategic Approach

Draft Policy SP2 identifies a need to deliver around 30,800 new dwellings in Shropshire over the plan period, which equates to around 1,400 dwellings per annum.

The draft policy adds that new development will be focused in urban areas, including Shrewsbury which should fulfil its role as a strategic centre and act as a focus for well-designed new housing. It goes on to explain that this should be supported by the provision of the necessary infrastructure and other public realm improvements within and on the edge of the town centre in support of the delivery of the Big Town Plan and its related masterplans.

AM Ventures is fully supportive of this draft policy. The residential development that is proposed on the land off Wood Street site would help Shropshire to achieve its growth aspirations, delivering well-designed new housing on a site comprising entirely of previously developed land that is currently under-utilised. It would also support the delivery of the Big Town Plan, including for example by facilitating the creation of an enhanced pedestrian and cycle connection along Bagley Brook, which is one of the key design principles identified by the Big Town Plan. Within the pre-application advice letter issued to AM Ventures 1 in November 2020, the Local Planning Authority acknowledged that the site offers opportunities to improve ecological and public connectivity in the area.

Draft Policy SP5. High Quality Design

Draft Policy SP5 is supported by AM Ventures 1. We firmly believe that the former Travis Perkins site offers a unique opportunity to deliver a residential development of a high standard of design which will enhance the character and appearance of the site, its immediate surroundings and the wider Shrewsbury town area, in accordance with the objectives of this draft policy.

Draft Policy SP7. Managing Housing Development

AM Ventures 1 is supportive of Draft Policy SP7, which states that in addition to supporting the development of housing on the allocations contained within the Local Plan, positive consideration

will also be given to other sustainable housing development. It adds that additional housing development opportunities which would support the reuse of disused land or premises or contribute towards achieving wider town centre regeneration will be supported.

This draft policy lends support for the residential development of the former Travis Perkins site that is proposed by AM Ventures 1. Although the site does contain existing buildings and extensive hard standings associated with its former use and some small-scale temporary light industrial uses that are still in operation, it is largely vacant and, in overall terms, is underutilised. Within the subsequent pre-application advice issued in January 2021, the Local Authority's Highways Team advised that the site is not suited to serve the current/former permitted land use, nor is it suited to serve an intensive commercial/employment land use. The residential development that is proposed would bring the site back into full use and would contribute positively towards the regeneration objectives for the wider town centre.

Draft Settlement Policy S16.1. Development Strategy: Shrewsbury Strategic Centre

Whilst the general thrust of this draft policy is supported by AM Ventures 1, we consider that it should be amended to specifically acknowledge that residential development on under-utilised or vacant employment land that is no longer suitable for this use will be supported, particularly where it would contribute towards the regeneration objectives for the wider town centre, providing the necessary technical and environmental constraints can be satisfactorily managed.

Completed Part A & Part B representation forms are enclosed.

If you have any queries or require any further information on any of the matters raised above, please do not hesitate to contact me. Otherwise, I would be grateful if you could confirm receipt of these representations.

Yours faithfully

Philip Grant
Associate Director
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For and on behalf of Avison Young (UK) Limited

Enc: completed Part A & Part B representation forms