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:	Roger Parry & Partners

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:	SHR 060	Policies Map:	Inset 16 Shrewsbury Town

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	☑	☐
B. Sound	☐	☑
C. Compliant with the Duty to Co-operate	☑	☐

(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 see statement

(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 see statement

(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:

To ensure the allocation of SHR060 is considered correctly.

(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:

Signature:		Date:	26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Ref: *2884/27687*
Your Ref: *Shropshire Council Regulation 19 Consultation*

Roger Parry & Partners

Eddie West
Shropshire Council
Planning Policy & Strategy Team
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

23 February 2021

Dear Eddie,

RE: Shropshire Council Local Plan – Regulation 19: Pre-Submission Draft of the Shropshire local Plan Consultation – SHR060. Hanwood Road, Shrewsbury.

I am writing in response to the consultation for the Pre-Submission Draft Shropshire Local Plan, on behalf of my client Davies Parry Ltd and in relation to land at Oakfields Farm, Hanwood Road, Edgebold, Shrewsbury, SY5 8NT. The site is identified as allocation SHR060.

We support the designation of SHR060 as a strategic mixed allocation as part of the Local Plan review and the site forms part of a wider allocation with adjoining sites SHR158 and SHR161.

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

It is clear from the draft development Strategy for Shrewsbury Town, that SHR060 is recognised as a sustainable and deliverable growth area during the new plan period, given its highly sustainable location immediately adjacent to the western development boundary of the town and unconstrained nature it forms a natural area for expansion.

The site is part of a wider strategic masterplan which includes sites SHR158 and SHR161 which are promoted for development by CEG. We confirm that SHR060 is deliverable within the short term of the plan period and the landowners intention is to submit a planning application as soon as possible. The wider site including SHR158/SHR161 is also deliverable in the plan period.

Technical analysis carried out to date confirms there are no significant barriers to delivery of site SHR060 and a summary of key considerations is set out below.

Design and Layout

A masterplan has been prepared for site SH060 in consultation with the neighbouring landowner of SHR158 and SHR161 to ensure both sites are well integrated with particular consideration given to transport and connectivity, including the provision of a secondary access road linking the two sites. A combined masterplan has also been produced for SHR060 and SHR158/061 which demonstrates that the three sites can be delivered together. The masterplan demonstrates that approximately 439

Hogstow Hall, Minsterley
Shrewsbury SY5 0HZ
Phone 01743 791336
Fax 01743 792770
mail@rogerparry.net
www.rogerparry.net
Offices also at Welshpool & Oswestry

Roger Parry & Partners • Partnership No. OC312203 • Registered Office: Hogstow Hall, Minsterley, Shrewsbury, SY5 0HZ • Registered in England and Wales
A list of members of the LLP is available at the above address

dwellings can be comfortably accommodated on SHR060 and circa 1500 across all three sites combined.

There is 0.5ha of employment use indicated on SHR060 which is supported based on local demand with open space and a green and blue corridor that separates the proposal with the existing built development to the east. The combined SHR060/158/161 masterplan also illustrates two potential areas to accommodate future education needs, one located to the east and another to the west of the existing education site to provide flexibility with regard to the most suitable area for expansion to be assessed following delivery of the SEN and Primary schools.

The primary access for SHR060 enters the site from Hanwood Road and is considered highway safety compliant, and the estate road will go through the site and link into the neighbouring sites SHR158 and SHR161 to the north west. Consultation has been undertaken with Shropshire Highways and Highways England to which has confirmed suitability of the proposed access arrangements and further dialogue will be held prior to any planning submission.

Cycleway and pedestrian links will be provided through the development, which will be developed more thoroughly within the planning stages to enhance permeability.

The proposal illustrates SHR060 is a highly deliverable site either independently or as part of a wider masterplan with SHR158/161 with a well-considered distribution of land use.

Education

The Draft Local Plan states that 4ha of land adjacent to the Bowbrook School site is required for the provision of future education facilities. The principle of providing an area of land for future education needs within the allocation for SHR 060/158/161 so as to consolidate these facilities is supported, however we suggest that some form of evidence based assessment is required in order to understand the potential quantum of future education need in the local area. This will ensure efficient use of land and housing delivery. We understand that no assessment has been carried out to date, and it is therefore appropriate to include a degree of flexibility within the allocation wording to allow for a suitable expansion area to be determined once future education need is further understood and prior to publication of the next iteration of the Local Plan. The landowners of both SHR060 and SHR158/161 wish to continue engagement with the Local Authority on this subject and are willing to assist wherever possible to help inform the next iteration of the Plan.

Highways and primary roads

The Highways Assessment has confirmed that SHR060 can be accessed from Hanwood Road and specific access plans and indicative plans illustrating that the site can accommodate a highway safety compliant access point are provided in the Appendices. The estate road will form a secondary access route connecting to the wider masterplan and north-south link road to the West of the site.

Hogstow Hall, Minsterley
Shrewsbury SY5 0HZ
Phone 01743 791336
Fax 01743 792770
mail@rogerparry.net
www.rogerparry.net
Offices also at Welshpool & Oswestry
Roger Parry & Partners • Partnership No. OC312203 • Registered Office: Hogstow Hall, Minsterley, Shrewsbury, SY5 0HZ • Registered in England and Wales
A list of members of the LLP is available at the above address

Roger Parry & Partners

Finance of the Local and Strategic Road Networks

It is stated within the draft allocation, that 'all necessary improvements to the Local and Strategic Road Networks will be undertaken and funded through the development'.

The provision of funding for road network improvements is supported to the extent they are required to mitigate the site-specific impact arising from sites SHR060 and SHR058/161. Road network improvements should be considered in the context of the allocation and could provide for contributions to mitigate the impact of development of the site alone. The relative highways impact of sites SHR060 and SHR158/161 should be considered independently.

Park & Ride & Employment Land

The Park & Ride element is to the north west of the wider site and does not form part of SHR060 however the estate road that is proposed as part of this site will assist in connecting the park and ride with the wider masterplan.

Local Centre & Services

The main Local Centre is proposed to the west of the education site and this location ensures that these amenities are accessible to all residents of the wider masterplan and existing residents of Bowbrook to the north. The cycle and pedestrian connections within the proposed site and its relationship with the existing developments ensure that the local centres will be well connected with the existing built development.

Medical Centre

It is indicated that 0.5ha is envisaged as an amount of land potentially required for a medical centre on the wider masterplan. If this is demonstrated as a requirement, this could be located close to the main Local Centre to the west of the Secondary School for ease of access to complimentary uses.

Residential Development

1500 dwellings have been indicated within the Local Plan review as the number of dwellings envisaged on the wider allocation for SHR060/158/161. This is a deliverable figure and approximately 439 dwellings can be comfortably delivered on SHR060, which is considered appropriate given the sites unconstrained nature and potential to meet housing need.

It is important to emphasise that we are fully in agreement with policy SP2 (Strategic Approach) and its focus on housing delivery, and the importance of providing sufficient land in the right locations to achieve the housing growth aspirations of the County.

Hogstow Hall, Minsterley
Shrewsbury SY5 0HZ
Phone 01743 791336
Fax 01743 792770
mail@rogerparry.net
www.rogerparry.net
Offices also at Welshpool & Oswestry
Roger Parry & Partners • Partnership No. OC312203 • Registered Office: Hogstow Hall, Minsterley, Shrewsbury, SY5 0HZ • Registered in England and Wales
A list of members of the LLP is available at the above address

5ha of employment land

The quantum of employment land located adjacent to the park and ride is supported and it is considered appropriate to locate such uses in this location. A smaller employment area of 0.5ha could be provided within SHR060 if there is sufficient demand in order to ensure that the development provides a diverse mix of uses. The location of the majority of the employment land to the west of SHR158/168 is considered the most appropriate location given the close proximity to the A5 and Park & Ride and less sensitive nature of this employment use. SHR060 is suited for a more residential led development given the surrounding residential character and superior transport infrastructure planned to the west of the site.

Green Infrastructure Corridors

Corridors of planting and environmental networks would be provided within the wider site to improve the Town's green network and support the Big Town Plan strategy. Inclusion of a green corridor to the east of the site is supported and would the existing pond could be integrated into this.
The wider masterplan continues this theme by indicating another green corridor at the centre of the wider development and on the west boundary of the overall site to the A5.

Pedestrian & Cycle Links

SHR060 will improve cycle and pedestrian links and the indicative masterplan illustrates the importance placed on pedestrian and cycle links through SHR060 and also its wider connectivity with SHR158/161, the existing built development and Town Centre. A new cycle route is proposed along the eastern boundary of SHR060 through a green corridor and these links could be further improved in future through integration with neighbouring development.

Heritage & Design

The site design and layout has been carefully considered and further design development and consultation will be carried out prior to planning submission. Given the scale of the allocation, some parts of the site will be laid out and designed differently to ensure the development associates itself with its immediate surroundings and the mix of dwellings meets local demand.

There are no heritage assets or sites in the immediate vicinity of the subject site, and therefore this allocation should not have a significant impact on heritage grounds.

Drainage and Flooding Strategy

A Flood Risk Assessment has been carried out, together with an indicative drainage strategy including surface water and foul water disposal which confirms an appropriate drainage strategy can be implemented and there are no significant barriers to delivery. A robust SUDS strategy will be provided to ensure its adherence with up to date standards.

Summary of considerations

SHR060 is fully supported and is clearly deliverable both independently or as part of a wider masterplan and provides a significant opportunity to generate sustainable development and meet housing need through the plan period and beyond.

Hogstow Hall, Minsterley
Shrewsbury SY5 0HZ
Phone 01743 791336
Fax 01743 792770
mail@rogerparry.net
www.rogerparry.net
Offices also at Welshpool & Oswestry
Roger Parry & Partners • Partnership No. OC312203 • Registered Office: Hogstow Hall, Minsterley, Shrewsbury, SY5 0HZ • Registered in England and Wales
A list of members of the LLP is available at the above address

Deliverability and Sustainability

The table below has been taken from Appendix 7 of the pre submission draft, which illustrates the forecast of delivery timescales of each allocation.
SHR060 has been included within a wider allocation including SHR158 and SHR161 and the allocation as a whole will be delivered within the plan period and beyond.

This site is deliverable and viable, with no constraints, and the work that has been undertaken to date, illustrates the confidence that this site will be delivered early in the plan period.

Given its close proximity to the towns development boundary SHR060 forms a natural next stage of expansion to the built up area and SHR060 could therefore commence delivery in the short term within the context of the wider allocation.

Site Allocation Reference	Site Allocation Name	Settlement	Place Plan	Residential Guideline	Employment Guideline	Short-Term (2020/21-2024/25)	Medium-Term (2025/26-2029/30)	Long Term (2030/31-2034/35)	Long Term (2035/36-2037/38)	Beyond the Plan Period (2038+)
SHF013	Land adjoining Meadow Drive, Shifnal	Shifnal	Shifnal	65	N/A					
SHF015 & SHF029	Land adjoining Beech House between A464 and Park Lane, Shifnal	Shifnal	Shifnal	65	N/A					
SHF022 & SHF023 (part)	Land between Windmill View and The Monument on A464, Shifnal	Shifnal	Shifnal	100	N/A					
SHF018b & SHF018d	Land east of Shifnal Industrial Estate, Upton Lane, Shifnal	Shifnal	Shifnal	N/A	39					
SHR054a	Land south of Sundorne Road, Shrewsbury	Shrewsbury	Shrewsbury	60	N/A					
SHR057 & SHR177	Land North of Mytton Oak Road, Shrewsbury	Shrewsbury	Shrewsbury	400	N/A					
SHR060, SHR158 & SHR161	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	Shrewsbury	Shrewsbury	1,500	5ha					
SHR145	Land south of Meole Brace Retail Park, Shrewsbury	Shrewsbury	Shrewsbury	150	N/A					
SHR173	Land west of Ellesmere Road, Shrewsbury	Shrewsbury	Shrewsbury	450	N/A					
SHR166	Land to the west of the A49, Shrewsbury	Shrewsbury	Shrewsbury	N/A	45ha					

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan Page 339

Surveys

We have undertaken a number of surveys and assessments to include Topographical Survey, Drainage Strategy, Flood Risk Assessment, Highway Transport Assessment some of which are included in the Appendices.

Conclusion

SHR060 is deliverable in the short term either as a standalone site or part of a wider development and the landowner intends to progress a planning application as soon as possible. The Council's allocation of SHR060 is strongly supported and we confirm that it is deliverable and viable and ask that this representation is considered in preparing the final plan to be adopted.

With reference to the current allocation, the principle of providing an area of land for future education needs within the allocation for SHR 060/158/161 so as to consolidate these facilities is supported, however we suggest that some form of evidence based assessment is required in order to understand the potential quantum of future education need in the local area.
The allocation should allow for a suitable expansion area to be determined once a evidence based assessment of future education need is undertaken and prior to publication of the next iteration of the Local Plan.

The provision of funding for road network improvements is acknowledged, however allocation wording should be amended to provide for contributions to mitigate the impact of the individual development.

We are happy and content in discussing this site and the wider site in more detail within the coming months to be able to move it forward to a planning stage.

Yours sincerely,

Roger L. Parry FRICS
Partner, Roger Parry & Partners LLP
roger@rogerparry.net

Member of:
LAND & NEW HOMES NETWORK

Appendices to include:

- Part A & B Consultation Form
- Location Plan
- Proposed Block Plan (SHR060)
- Wider allocation Masterplan (Including SHR158 & SHR161)
- Flood Risk Assessment (which includes Drainage Strategy)
- Topographical Survey
- Highway & Transport Assessment