



For Shropshire  
Council use

Respondent  
no:

25 APR 2014

## **Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan**

**Pre-Submission Draft (Final Plan)  
17 March 2014 – 28 April 2014**

### **Representations Form**

**Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:  
[www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev)**

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at [www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev).

#### **Your details: Who is making this representation?**

Name:	ANDREW WHITEHOUSE
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

**If you are acting as an Agent, please use the following box to tell us who you are acting for:**

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

WHIT 046

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (Please tick all that apply):

<b>Positively prepared</b>	<input type="checkbox"/>
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	<input checked="" type="checkbox"/>
<b>Consistent with National Policy</b>	<input type="checkbox"/>

**In the box below please specify your reason for supporting or objecting.**

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

PLEASE READ ATTACHED DOCUMENT.



**Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound?** You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

DELETE THE PROPOSED DEVELOPMENT  
AT MOUNT FARM - WHIT046 IN  
ACCORDANCE WITH SHLAA.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

**Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination.

☐

No, I wish to pursue my representations through this written representation.

☒

If you wish to attend the examination, please explain why you think this is necessary in the box below:

**Do you wish to be notified of any of the following?** Please tick all that apply. We will contact you using the details you have given above.

When the SAMDev Plan has been submitted for examination	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>

## **Consideration of the soundness of the decision to include Mount Farm Whitchurch in SAMDev, and objections for its inclusion.**

The objections listed below follow the initial letter from David Wilson Homes dated 5th November 2013 in which they announced that they were setting up a pre-consultation programme prior to applying for planning permission to build 100 houses on land at Mount Farm, Whitchurch.

Individual meetings with residents followed on 19th November and a public exhibition on 28th November. This was attended by most if not all residents in the 15 houses on Wellfield Way, and by many others who were concerned about the impact of the proposed Mount Farm development.

A review of the main points raised by individual residents who wrote to David Wilson Homes has provided the basis for this document, which highlights the strength of opposition to initial proposals.

## **Conclusions of the Government Inspector on the North Shropshire Local Plan 2000-2011**

It is important, and very relevant, before considering the inclusion of Mount Farm in the SAMDev as a preferred site, to look back at the Government Inspectors report on his findings after the public inquiry on the North Shropshire Local Plan 2000-2011.

He was concerned at the lack of a primary school in the vicinity of the site, and no proposals to provide one.  
He also had a firm view that

**“ the site is elevated and development would be prominent in views from the north and north-west. Viewed from the direction of Tarporley Road the development would occupy open ground above the level of The Grove, extending southwards from Wellfield Way. Much of this land has an undeveloped appearance and is of high visual amenity value.**

The character of the landscape in this area at present displays an attractive pastoral quality of relatively small scale fields, with a network of hedgerows and trees. The landscape generally falls from the higher ground by Haroldgate towards the northwest. I consider that it would constitute a substantial area of new development in a relatively sensitive landscape, occupying an elevated position. This is a relatively unspoilt approach to Whitchurch which in my judgement contributes strongly to its character and setting as a rural market town. The impact of existing development on the skyline is limited and the predominant characteristic is of a well maintain rural landscape “.

***Nothing has changed in the area which would alter this opinion. The Mount Farm land was deleted from the Local Plan.***



## Infrastructure

Bearing in mind the proposals for **500** houses at Tilstock Road together with a school, **86** houses to be built next to the Hill Valley Golf Club, **76** houses going on Mile Bank Road brown field site and the **100** houses going on Mount farm, who will pay for the increased infrastructure needed to service the extra population eg Doctors, District Nurses, Schools, Police, Fire etc etc? When will these increased services be provided – day 1? Is there any commitment for this and who will provide it? Such provision is conspicuous by its absence. This is totally unacceptable

There are **currently** insufficient places available in local junior schools for existing residents, and the local Doctors surgeries are also full to capacity. A contribution (the proposed Community Infrastructure Levy of £40 per square metre, ie £500,000) to the local authority is totally inadequate to enable them to improve the necessary services which will be required by the new residents.

**Whitchurch is a dormitory town without employment available locally to sustain the proposed increase in the number of residents. Where is the proof that there is a demand for additional housing of this type in Whitchurch? It is not just employment, but what facilities will be provided for the children and teenagers to keep them occupied and grow up responsibly. Youth clubs etc will have to be provided, but by whom and when.**

## The Design and Density of the proposed Development

Wellfield Way and Tarporley Road are areas with high end and prestige housing and the proposed site is not in keeping with the character of the area. It will adversely impact upon the open aspect of the landscape and the proposed development will be outside the present designated area for building. Placing 100 houses on Mount Farm **is far too high a density of housing** with no acknowledgement of the detrimental impact it will have upon the residents of Wellfield Way and the value of their properties. Residents of Wellfield Way will then have three storey properties sited within 10m of their boundary. It would make far more sense to have the 10 metre environmental wildlife buffer zone between the existing development of Wellfield Way and the proposed houses, instead of between the new development and the fields.

No inclusion has been made for the provision of bungalows (which would be a far more aesthetically acceptable outlook if their plots were positioned adjacent to the rear gardens of Wellfield Way). This failure to include bungalows is a major omission as there is a severe shortage of large bungalows which are in high demand in the area. This can be seen by recent sales transactions of good sized detached bungalows along Tarporley Road and The Grove, whereas 'high-end' detached houses such as those in Wellfield Way have failed to sell – there are still two remaining unsold.

The proposed 3 storey houses are not in keeping with the local character and are simply a cheap way of providing several bedrooms on a small plot. They are solely a means of maximising developer's profits. They are a blot on the landscape and offensive to any local residents living in traditional 2 storey properties, or bungalows. **They lower the tone of the area for anyone approaching the town from Cheshire, by creating an initial impression of Whitchurch as being very high density and lacking any character, although Whitchurch is currently known for and proud of its heritage and character buildings.**



## Phasing of all housing Development in Whitchurch

In policy H2 Housing land and Phasing the District Council state that they will keep the supply of housing land under review with the aim of ensuring that at any time sufficient land is available to meet the planned needs of the District Council for the next 5 years. The Council will require the phased development of sites listed under policies H4 and H5. This is to assure that the total planned provision is not exhausted in the early years; that an excessive amount of land is not made available at the outset; that a settlement is not swamped by over development and ensure the availability of infrastructure or adequacy of other services in a particular area.

We would ask that the Council to keep a close watch on this policy and hold back on planning permissions where appropriate ie Mount Farm.

## Drainage, Sewerage and Groundwater concerns

Our sewers, both foul and surface water, were at capacity when Seddon built this estate. We are concerned the pumping station and pipework need to be upgraded to cope with the vastly increased flow. Is this sustainable development?

The proposed site is prone to severe flooding during heavy rainfall and the inclusion of a pond seems to be a rushed answer to the inherent flooding of the field by Mount Farm ( it was not in the initial plans shown by DW.) It is understood it is a balancing lake to provide monitored discharge to the ditch, but it is a system which will be left for nature to oversee. Who will secure it against children falling in and pollution risks? It will also become a breeding ground for mosquitoes and blue algae. Is this good for the environment and of benefit to the local residents of the area?

All rainwater will discharge to a ditch which crosses behind The Groves which is subject to flooding at the moment. **Has the Environment Agency carried out a Flood Risk Assessment on the proposed site, and subsequent drainage ditches and water courses which will be involved in disposing of the surface water from the site?**

## Problems with Access

The access road Haroldgate is unsuitable for any increased traffic flow. Despite conforming to general transport regulations of width etc, a closer and more detailed inspection will show from where the hazards arise. Many of us have used this road through all weathers for 14 years and are acquainted with the problems, but the proposed increase in traffic movement of 700% will provide lethal conditions for all road users.

We understand that all access for agricultural vehicles servicing the remaining fields of Mount Farm will not be using Haroldgate. We have been told the farmer has acquired another access off the Chester Road. Can the Council please confirm that this is the case, and put a condition on the planning permission (if it gets that far) that this is required?

The road has very tight bends as it goes down to Tarporley Road, and slopes sideways as it turns. The gradient is very steep - at the maximum allowed of 1 in 12. This means that during icy conditions it is very difficult and often impossible to access Haroldgate from Tarporley Road as one cannot gain sufficient traction before wheel



spin takes over. When descending Haroldgate in frosty weather it is very easy to slide sideways out of control often resulting in one sliding across Tarporley Road. We have all experienced numerous incidents as it only takes icy conditions to set it off. The bends are so tight it is hard for 2 vehicles to pass at all and only made more perilous during bad weather. It is totally unusable for longer vehicles such as a service bus, or vehicles with a trailer or caravan.

If it is intended to service 100 extra houses it will result in a minimum of 180-200 additional cars exiting Haroldgate. It will become a bottleneck at peak times - the morning and afternoon school run for example. Cars will be used as there are no schools currently within what parents will consider a safe walking distance from the proposed site, with the majority of traffic turning right across Tarporley Road. This will result in excess pollution whilst engines are still cold, increased noise and extended journey times at peak periods while vehicles queue to exit Haroldgate.

The risks associated with using Haroldgate during bad weather will be exacerbated by the massive increase in traffic volume. Vehicles exiting the proposed Mount Farm development will also need to negotiate the considerable gradient to reach the apex of Haroldgate.

As one drives up Haroldgate towards Wellfield Way the sun comes into view which temporarily blinds the driver with the dazzling light. This is of course dependent on the time of day but it can be a significant hazard which with the increased traffic could increase the potential for an accident. Indeed the same problem occurs when turning right onto Tarporley Road from Haroldgate in the morning. This is of course when most traffic is leaving the site and turning right to go in to town. This is a dangerous blindspot.

## **Conclusion**

There are other sites which would present greater opportunities to include the necessary provision of infrastructure resources to support increased housing provision in Whitchurch. All in all our concern is that this is a Housing estate which is **not** needed in Whitchurch at the present time. As there are over 150 homes currently for sale in Whitchurch, will all these houses sell, and where are the jobs to sustain the influx population? There are no substantive proposals for how this population increase might be sensibly sustained.

**It is clear that Whitchurch has been allocated an unreasonable and unsustainable level of new house development, culminating in the proposed Mount Farm development which is not required and should be deferred until the new build housing in the pipeline has been built and sold.**

It was rejected by the Government inspector in the last round of the North Shropshire Local Plan 2000-2011 mainly due to the high visibility of the site on the approach to Whitchurch, and the lack of a primary/junior school on the North of the town. This will inevitably mean many journeys to transport children to schools away from the site, at least twice a day. Not sustainable development.

**The lack of schooling was highlighted in the SAMDev background evidence : Whitchurch Housing Sites Assessment, page 212, together with electricity and sewage upgrades required, and including the need for a flood risk assessment.** The junction of Haroldgate to Tarporley Road was also included, with the need for safety improvements provided to facilitate development .*This document was*

*obviously produced as a desk top exercise, lacking the local, on the ground knowledge, which makes the resultant decision dubious and unsafe.*

***The site was rejected by SHLAA in 2009 as being contrary to existing policy. SHLAA is a key component of the evidence base to support the delivery of sufficient land for housing to meet the community's need for more homes.( PPS3 )***

**We ask for your support and judgement on our concerns and reject the inclusion of Mount Farm as a preferred site from the SAMDev as the inclusion is unsound, not justified and not effective for the above reasons.**

**Mr and Mrs A Whitehouse**